

IN THE
Supreme Court of the United States

LUIS A. NIEVES, ET AL.,

Petitioners,

v.

RUSSELL P. BARTLETT,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent contains 8,724 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 9, 2018.



Brian R. Frazelle
Counsel for *Amicus Curiae*