CERTIFICATE OF COMPLIANCE

No. 17-6086

IN THE SUPREME COURT OF THE UNITED STATES

HERMAN AVERY GUNDY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of Pacific Legal Foundation In Support of Reversal contains 7,822 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 May 30, 2018.

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