CERTIFICATE OF SERVICE

No. 17-646

Terance Martez Gamble,

Petitioner,

v.

United States of America,

Respondent.

I, Gordon D. Todd, do hereby certify that, on this first day of November, 2018, I caused three copies and an electronic copy of the Brief of *Amici Curiae* National Association of Counties, et al. in Support of Respondent in the foregoing case to be served by overnight commercial carrier, and by email, on the following parties:

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