IN THE Supreme Court of the United States

UNITED STATES OF AMERICA, Petitioner,

v.

JASON DANIEL SIMS, *Respondent*.

On Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Bradley N. Garcia, a member of the bar of this Court, certify on this 14th day of August 2018 that the Brief for Respondent in the above-captioned case contains 10,775 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Bradley N. Garcia