No. 17-765 and 17-766

IN THE

Supreme Court of the United States

UNITED STATES OF AMERICA,
Petitioner,

v.

VICTOR J. STITT, II,
Respondent.

UNITED STATES OF AMERICA,
Petitioner,

v.

JASON DANIEL SIMS,
Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for the National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Respondents contains 6,510 words and complies with the word limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: August 21, 2018

/s/Kellam Conover

Kellam Conover