In The Supreme Court of the United States

JASON PARKER,

Petitioner,

v.

MONTGOMERY COUNTY CORRECTIONAL FACILITY/BUSINESS OFFICE MANAGER, ET AL.,

Respondents.

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 Petitioner contains 3,702 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 December 22, 2017.

Brianne L. Gorod

Counsel for Amicus Curiae