



**CERTIFICATE OF COMPLIANCE**

No. 17-950

ROSS WILLIAM ULBRICHT,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of Downsize DC Foundation, DownsizeDC.org, Conservative Legal Defense and Education Fund, Gun Owners Foundation, Gun Owners of America, Inc., and Restoring Liberty Action Committee in Support of Petitioner contains 5,933 words, excluding the parts of the Brief 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 February 5, 2018.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: February 5, 2018

Julie Anne Kershner

Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2018