

CERTIFICATE OF COMPLIANCE

No. 17-950

ROSS WILLIAM ULBRICHT,

PETITIONER,

v.

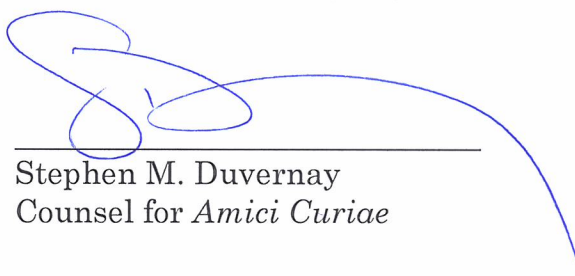
UNITED STATES OF AMERICA,

RESPONDENT.

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amici curiae* Reason Foundation, et al., contains 5,995 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.



Stephen M. Duvernay
Counsel for *Amici Curiae*