IN THE

Supreme Court of the United States

BRIDGET ANNE KELLY,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for *Amicus Curiae* Senator Sheldon Whitehouse in *Kelly v. United States*, No. 18-1059, complies with the word limitations, as it contains 7,094 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: November 27, 2019

Michael D. Meuti