CERTIFICATE OF COMPLIANCE

No. 18-1109

IN THE

Supreme Court of the United States

JAMES ERIN MCKINNEY, Petitioner,

V.

ARIZONA,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE SUPREME COURT OF ARIZONA

As required by Supreme Court Rule 33.1 (h), I certify that the *Amicus Brief* of *The Promise of Justice Initiative* in support of Petitioner contains five thousand nine hundred and fifty-nine(5959) words, excluding the parts of the Amicus 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 March 28, 2019.

C. Chu an

G. Ben Cohen, La. Bar Roll # 25370