

In the Supreme Court of the United States

BRETT JONES,

Petitioner,

v.

MISSISSIPPI,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Ethan Townsend, a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief of the American Bar Association as *Amicus Curiae* in support of petitioner contains 6,044 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Ethan H. Townsend _____

Ethan H. Townsend