

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Ralph C. Nash, Jr. in Support of Petitioner in *Securiforce International America, LLC, v. Untied States of America*, No 18-37, in support of Petitioners, contains 1,656 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

August 6, 2018

/s/ Mark Fox Evens

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