## CERTIFICATE OF COMPLIANCE

Docket No.

Joseph David Robertson v. United States of America

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari of Pacific Legal Foundation In Support of Petitioner contains 8,943 words, excluding the parts of the document 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 November 6, 2018.

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