

CERTIFICATE OF COMPLIANCE

No. 18-609

JOHN DAVID ROBERTSON, *Petitioner*,

v.

UNITED STATES OF AMERICA, *Respondent*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Center for Constitutional Jurisprudence in support of Petitioners contains 2,749 words, excluding the parts of the 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 December 10, 2018

A handwritten signature in black ink, appearing to read 'Eastman', is written over a horizontal line.

John C. Eastman
Counsel for *Amicus Curiae*
Center for Constitutional
Jurisprudence