

CERTIFICATE OF COMPLIANCE

Docket No. 18-609

Joseph David Robertson v. United States of America

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief contains 2,719 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 March 20, 2019.

A handwritten signature in black ink, reading "AL François". The signature is fluid and cursive, with the first name "AL" being more prominent and the last name "François" written in a flowing script.

ANTHONY L. FRANÇOIS

Counsel of Record

Pacific Legal Foundation

930 G Street

Sacramento, California 95814

Telephone: (916) 419-7111

E-mail: alf@pacificlegal.org

Counsel for Amicus Curiae of

Pacific Legal Foundation