

No. 18-900

---

IN THE  
Supreme Court of the United States

---

PHILIP ZODHIATES,

*Petitioner,*

v.

UNITED STATES

*Respondent.*

---

On Petition for Writ of Certiorari to the United States Court of Appeals for the  
Second Circuit

---

MOTION FOR LEAVE TO FILE AND BRIEF OF *AMICUS CURIAE* FOUNDATION  
FOR MORAL LAW IN SUPPORT OF PETITIONER

---

As required by Supreme Court Rule 33.1(h), I certify that the above-captioned document contains 3,157 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 February 5, 2019.

/s/ Matthew J. Clark

Matthew J. Clark  
FOUNDATION FOR MORAL LAW  
One Dexter Avenue  
Montgomery, AL 36104  
(334) 262-1245  
matt@morallaw.org

*Counsel for Amicus Curiae*