



CERTIFICATE OF COMPLIANCE

No. 18-900

PHILIP ZODHIATES,

Petitioner,

v.


UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Downsize DC Foundation, DownsizeDC.org, Free Speech Coalition, Free Speech Defense and Education Fund, Gun Owners Foundation, Gun Owners of America, Inc. Policy Analysis Center, Fitzgerald Griffin Foundation, and Restoring Liberty Action Committee in Support of Petitioner contains 3,483 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 February 7, 2019.



Donna J. Wolf
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: July 7, 2019

Julie Anne Kershner
Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023