



## CERTIFICATE OF SERVICE

I, Donna J. Wolf, hereby certify that 1 unbound and 40 copies of the foregoing 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 in 18-900, *Philip Zodhates v. United States*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 7th day of February, 2019:

Robert Benjamin Hemley  
Gravel & Shea PC  
76 St. Paul Street, 7th Floor  
P.O. Box 369  
Burlington, VT 05402-0369  
(802) 658-0220  
rhemley@gravelshea.com

### *Counsel for Petitioner*

Noel Francisco  
Solicitor General of the United States  
Room 5616  
DEPARTMENT OF JUSTICE  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530-0001  
(202) 514-2217  
SupremeCtBriefs@USDOJ.gov

### *Counsel for Respondent*

Herbert W. Titus  
*Counsel of Record*  
William J. Olson  
Jeremiah L. Morgan  
Robert J. Olson  
William J. Olson, P.C.  
370 Maple Ave. W., Ste. 4  
Vienna, VA 22180-5615  
(703) 356-5070  
wjo@mindspring.com

*Counsel for Amici Curiae*

All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on February 7, 2019.

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

Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: Feb 7, 2019  
Julie Anne Kershner  
Notary Public

[seal]



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