



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 of the Religious Freedom Coalition as *Amicus Curiae* Supporting Petitioner contains 3,294 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 11, 2019.

Julie A. Kershner
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: February 11, 2019

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023