

## CERTIFICATE OF COMPLIANCE

No. 18-936

## JEREMY KETTLER,

Petitioner,

v.

## UNITED STATES OF AMERICA.

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 2,932 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 May 23, 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:

Notary Public

[seal]

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