IN THE

Supreme Court of the United States

VINCENT ASARO,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I declare that the Brief of *Amicus Curiae* Due Process Institute in Support of Petitioner in the above-captioned case contains <u>3.581</u> words, excluding 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 the 5th day of October 2018.

SHANA-TARA O'TOOLE Counsel of Record

DUE PROCESS INSTITUTE

700 Pennsylvania Ave., SE

Suite 560

Washington, D.C. 20003

Shana@iDue Process.org

(202) 558-6683