

CERTIFICATE OF COMPLIANCE

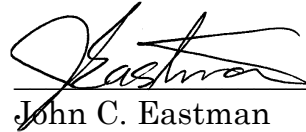
No. 19-1115

AMERICAN BANKERS ASSOCIATION, *Petitioner*,  
v.  
NATIONAL CREDIT UNION ADMINISTRATION, *Respondent*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Center for Constitutional Jurisprudence in support of Petitioner in the above-referenced cases contains 3,424 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 April 10, 2020



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John C. Eastman  
Counsel for *Amicus Curiae*  
Center for Constitutional  
Jurisprudence