## CERTIFICATE OF COMPLIANCE

No. 19-514

IN THE

## Supreme Court of the United States

Nikko A. Jenkins, Petitioner, v. State of Nebraska,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Nebraska

As required by Supreme Court Rule 33.1 (h), I certify that the *Amicus Brief* of *The Promise of Justice Initiative* in support of Petitioner contains five thousand six hundred and ninety-nine (5,699) words, excluding the parts of the Amicus 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 November 19, 2019.

G. Ben Cohen, La. Bar Roll # 25370