

**IN THE
Supreme Court of the United States**

UNITED STATES OF AMERICA,

Petitioner,

v.

EVELYN SINENENG-SMITH,

Respondent.

**On Writ of Certiorari to the
United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jeremy Girton, a member of the bar of this Court, certify on this 22nd day of January, 2020, that the Brief for Religious Organizations as *Amici Curiae* in Support of Respondent in the above-captioned case contains 7,018 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).



Jeremy Girton