

No. 19-8105

IN THE
Supreme Court of the United States

JUSTIN ANDERSON,
Petitioner,

v.

DEXTER PAYNE, Director,
Arkansas Division of Correction.
Respondent.

**On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Eighth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Lisa Pensabene, a member of the bar of this Court, certify on this 27th day of April 2020, that the Brief of National Organization on Fetal Alcohol Syndrome as *Amicus Curiae* in Support of Petitioner in the above-captioned case contains 4,141 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Lisa Pensabene
Lisa Pensabene