CERTIFICATE OF COMPLIANCE

No. 20-103

STEPHEN E. STOCKMAN, Petitioner, v. UNITED STATES OF AMERICA, 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 the Petitino for Writ of Certiorari in the above-referenced cases contains 1,981 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 September 2, 2020

John C. Eastman

Counsel for *Amicus Curiae* Center for Constitutional

Jurisprudence