In the Supreme Court of the United States

ERNEST JOHNSON,

Petitioner,

V.

ANNE L. PRECYTHE, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the Supreme Court Bar and, as required by Supreme Court Rules 33.1(h) and 33.1(g)(i), the Petition for a Writ of Certiorari contains 7,917 words, excluding the parts of the petition that are exempted by Supreme Court Rule 33.1(d).

Dated: August 28, 2020 Respectfully submitted,

Arn Jacobsen