In the Supreme Court of the United States

REX HAMMOND, Petitioner, v. United States of America, Respondent.

CERTIFICATE OF SERVICE

I, Paul J. Sampson, counsel for amicus curiae The Rutherford Institute and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this brief of *amici curiae* in support of petition for certiorari contains 4,137 words, excluding the parts of the brief that are exempted by Rule 33.1(d):

Paul J. Sampson