



**CERTIFICATE OF COMPLIANCE**

No. 17-155

ERIK LINDSEY HUGHES,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Richard M. Re as *Amicus Curiae* in Support of Neither Party contains 4,552 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 January 26, 2018.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: July 26, 2018

Julie Anne Kershner  
Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2018