

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 17-646

Terance Martez Gamble,

*Petitioner,*

v.

United States of America,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Gordon D. Todd, certify that the Brief of *Amici Curiae* National Association of Counties, et al. in Support of Respondent in the foregoing case contains 7,780 words, excluding the parts of the document 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 November 1, 2018.

/s/ Gordon D. Todd  
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