

IN THE  
**Supreme Court of the United States**

EDWARD G. McDONOUGH,

*Petitioner,*

v.

YOUEL SMITH, INDIVIDUALLY AND AS SPECIAL DISTRICT ATTORNEY FOR THE COUNTY OF  
RENSSELAER, NEW YORK, AKA TREY SMITH,

*Respondent.*

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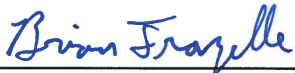
**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 7,682 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 March 4, 2019.



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Brian R. Frazelle  
Counsel for *Amicus Curiae*