



**CERTIFICATE OF COMPLIANCE**

No. 18-936

JEREMY KETTLER,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* States of Kansas, Arkansas, Idaho, Louisiana, Montana, South Carolina, Texas, and Utah in Support of Petitioner contains 2,580 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 February 19, 2019.

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

Date: February 19, 2019

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023