



CERTIFICATE OF COMPLIANCE

No. 19-67

UNITED STATES OF AMERICA,

Petitioner,

v.


EVELYN SINENENG-SMITH,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Eugene Volokh in Support of Neither Party contains 3,783 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 December 9, 2019.



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

Date: December 9, 2019

[Signature]
Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023