

In the Supreme Court of the United States

JUSTIN RASHAAD BROWN,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

EUGENE JACKSON,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

I, Daniel E. Jones, counsel for The National Association of Criminal Defense Lawyers and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of The National Association of Criminal Defense Lawyers as *Amicus Curiae* In Support of Petitioners contains 2698 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Daniel E. Jones

Daniel E. Jones
Mayer Brown LLP
1999 K Street, NW
Washington, DC 20006
djones@mayerbrown.com
(202) 263-3000