

No. 19-1309

IN THE
Supreme Court of the United States

KARI JANA E PHIPPS,

Petitioner,

v.


STATE OF IDAHO,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for Idaho Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner contains 5,678 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: June 22, 2020



Akiva Shapiro