

No. 19-1285

ANDREA LEA, in her official capacity
as Auditor of the State of Arkansas,

Petitioner,

v.

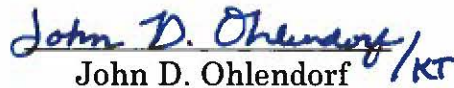
UNITED STATES, *et al.*,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, John D. Ohlendorf, a member of the Supreme Court Bar, certify that the REPLY BRIEF FOR PETITIONER in the above entitled case complies with the typeface requirements of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that this brief complies with the word limitation of Supreme Court Rule 33.1(g)(iii), containing 2,951 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Date: July 31, 2020


John D. Ohlendorf /KT