

July 29, 2019

Hon. Scott S. Harris
Clerk of Court
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

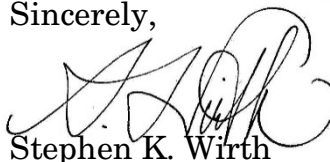
Re: *Peithman v. United States* (No. 19-16)

Dear Mr. Harris:

I certify pursuant to Supreme Court Rule 33.1(h) that the Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioners filed in the above-referenced case contains 4,041 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare, as a member of the Bar of this Court, that the foregoing is true and correct.

Sincerely,



Stephen K. Wirth