

No. 19-223

In the Supreme Court of the United States

JANICE SMYTH,

Petitioner,

v.

CONSERVATION COMMISSION OF FALMOUTH, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Mountain States Legal Foundation and the Cato Institute as *Amici Curiae* in Support of Petitioner contains 3,699 words, excluding the parts of the document 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 September 18, 2019.

/s/ Cristen Wohlgemuth

Cristen Wohlgemuth
Counsel of Record
David C. McDonald
Mountain States Legal Fdtn.
2596 South Lewis Way
Lakewood, Colorado 80227
(303) 292-2021
cristen@mslegal.org
dmcdonald@mslegal.org

Ilya Shapiro
Trevor Burrus
CATO INSTITUTE
1000 Mass. Ave. N.W.
Washington, D.C. 20001
(202) 842-0200
ishapiro@cato.org

September 18, 2019

Attorneys for Amici Curiae