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September 23, 2019

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

RE: NO. 19-234: LIBERTARIAN NATIONAL COMMITTEE, INC. V. FEDERAL

ELECTION COMMISSION

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* The Institute for Free Speech in Support of Petitioner referenced above contains **2,458** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.

Principal