No. 19-67

United States of America, PETITIONER,

V.

EVELYN SINENENG-SMITH,

RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute as *Amicus Curiae* Supporting Respondent contains 4,484 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro Counsel of Record