

**CERTIFICATE OF COMPLIANCE**

Docket No. 19-831

*Jarchow, et al. v. State Bar of Wisconsin et al.,*

As required by Supreme Court Rule 33.1(h), I certify that the **Brief Amicus Curiae of Pacific Legal Foundation, Cato Institute, Atlantic Legal Foundation, Reason Foundation, and Individual Rights Foundation In Support of Petitioners** contains 3,503 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 January 29, 2020.



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