IN THE

Supreme Court of the United States

ADAM JARCHOW, ET AL.,

PETITIONERS,

V.

STATE BAR OF WISCONSIN, ET AL.,

RESPONDENTS.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Liberty Justice Center & Mackinac Center supporting petitioners' application for certiorari contains 4,268 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 31, 2020.

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