In the Supreme Court of the United States

ADAM JARCHOW AND MICHAEL D. DEAN, Petitioners, v.

STATE BAR OF WISCONSIN, ET AL., Respondents.

## CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amicus Curiae Buckeye Institute In Support Of Petitioners in case No. 19-831 contains 4,612 words, excluding 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 the 3d day of February 2020.

JOÁN J. PARK, JR. V 616-B GREEN STREET GAINESVILLE, GA 30501

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