No. 20-138

Donald J. Trump, President of the United States, et al., Petitioners,

V.

SIERRA CLUB, ET AL., RESPONDENTS.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Respondents contains 1,366 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro Counsel of Record