

**No. 20-1747**

ERICH G. SORENSON,  
*Petitioner,*

*v.*

COMMONWEALTH OF MASSACHUSETTS,  
*Respondent.*

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**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 Petitioner contains 3,193 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Clark M. Neily III  
*Counsel of Record*