

**20-1752**

DEVAR HURD,  
*Petitioner,*  
v.

STACEY FREDENBURGH,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioner contains 4,833 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jay R. Schweikert  
*Counsel of Record*