

No. 20-6436

DANIEL LOVATO,

PETITIONER,

V.

UNITED STATES OF AMERICA,

RESPONDENT.

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 2,164 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro

Counsel of Record