

**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*