

No. 21-1336

JEFFREY OLSEN,
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 4,398 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jay Schweikert
Counsel of Record