

**21-783**

PATSY K. COPE, ET AL.,  
*Petitioners,*  
v.

LESLIE W. COGDILL, ET AL.,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE CATO INSTITUTE, LAW ENFORCEMENT ACTION PARTNERSHIP, AND RODERICK & SOLANGE MACARTHUR JUSTICE CENTER AS AMICI CURIAE IN SUPPORT OF PETITIONERS contains 4,200 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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