In the Supreme Court of the United States

Foundation for Individual Rights in Education, et al. Petitioner,

υ.

VICTIM RIGHTS LAW CENTER, ET AL.,

Respondent.

CERTIFICATE OF COMPLIANCE As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Mountain States Legal Foundation's Support of Petitioner contains 5,285 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2021

/s/ Cristen Wohlgemuth

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