In the Supreme Court of the United States

GEORGE SHEETZ,

Petitioner,

v.

COUNTY OF EL DORADO, CALIFORNIA,

Respondent.

On Petition for a Writ of Certiorari to the Court of Appeal of California Third Appellate District

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 4,930 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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June 2, 2023