In the Supreme Court of the United States

GEORGE SHEETZ,

Petitioner,

v.

COUNTY OF EL DORADO, CALIFORNIA,

Respondent.

On 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 5,187 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Anastasia P. Boden Counsel of Record CATO INSTITUTE 1000 Mass. Ave., NW Washington, DC 20001 (202) 216-1414 aboden@cato.org

November 20, 2023