

No. 22-177

IN THE
Supreme Court of the United States

MONICA TOTH,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Professor Beth A. Colgan as *Amicus Curiae* in Support of Petitioner contains 5,984 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: September 28, 2022

/s/ Katherine Moran Meeks

Katherine Moran Meeks