

In The
Supreme Court of the United States

MONICA TOTH,
Petitioner,

v.

UNITED STATES,
Respondent,

*On Petition for Writ of Certiorari to
the United States Court of Appeals for the First Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioner contains 2,759 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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