## IN THE

## Supreme Court of the United States

UNITED STATES DEPARTMENT OF AGRICULTURE RURAL DEVELOPMENT RURAL HOUSING SERVICE,

Petitioner,

v.

REGINALD KIRTZ,

Respondent.

## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent contains 4,176 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 October 2, 2023.

Brianne J. Gorod

Counsel for Amicus Curiae