

IN THE
SUPREME COURT OF THE UNITED STATES

No. 22-912

JAMES KING,

Petitioner,

v.

DOUGLAS BROWNBACK AND TODD ALLEN,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Public Citizen in Support of Petitioner filed today in this case contains 3,674 words, as calculated by the Microsoft Word word processing program and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 22, 2023.



Allison M. Zieve