

In the
Supreme Court of the United States

AMERICAN FOREST RESOURCE COUNCIL, ET AL.,
Petitioners,

v.

UNITED STATES OF AMERICA, ET AL.,
Respondents

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Roseburg Area Chamber of Commerce and NFIB Small Business Legal Center, Inc. in Support of Petition for Certiorari contains 4,429 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 December 15, 2023

Ivan L. London
Counsel of Record
MOUNTAIN STATES
LEGAL FOUNDATION
2596 South Lewis Way
Lakewood, Colorado 80227
(303) 292-2021
ilondon@mslegal.org

Attorneys for Amicus Curiae