

No. 23-727

---

IN THE  
**Supreme Court of the United States**

---

STATE OF IDAHO,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondents.*


---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioner contains 5,975 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

Executed on April 11, 2024.

  
\_\_\_\_\_  
JOHN J. BURSCH  
ALLIANCE DEFENDING FREEDOM  
440 First Street, NW, Suite 600  
Washington, DC 20001  
jbursch@ADFlegal.org

*Counsel for Petitioner*

---