

IN THE
SUPREME COURT OF THE UNITED STATES

No. 19-546

DOUGLAS BROWNBACK, ET AL.,
Petitioners,

v.

JAMES KING,
Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amici Curiae Public Citizen filed in this case contains 3,906 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 August 27, 2020.



Allison M. Zieve