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August 31, 2020

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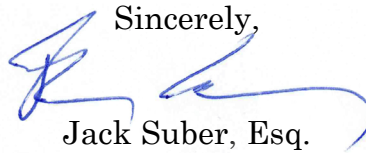
RE 19-546: DOUGLAS BROWNBACK, ET AL. V. JAMES KING

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute and National Police Accountability Project as *Amici Curiae* in the case referenced above contains **7,950** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 31st day of August 2020.

