

20-1066

ASHLYN HOGGARD,
Petitioner,
v.

RON RHODES, ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioner contains 4,904 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jay R. Schweikert
Counsel of Record