

No. 20-1088

DAVID CARSON, AS PARENT
AND NEXT FRIEND OF O. C., ET AL.,
Petitioners,

v.

A. PENDER MAKIN,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* Supporting Petitioners contains 4,803 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record