

No. 20-1678

In the Supreme Court of the United States

DANIEL Z. CROWE, *et al.*

Petitioners,

v.

OREGON STATE BAR, *et al.*

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Protect the 1st, Inc. as *Amicus Curiae* Supporting Petitioners in *Crowe v. Oregon State Bar*, No. 20-1678 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,294 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).



Gene C. Schaerr