

20-444

UNITED STATES,  
*Petitioner,*  
v.

MICHAEL ANDREW GARY,  
*Respondent.*

**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 Respondent contains 3,581 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Jay R. Schweikert  
*Counsel of Record*