

**In the
Supreme Court of the United States**

RICHARD BLUMENTHAL, ET AL.,
Petitioners,

v.

DONALD J. TRUMP,
PRESIDENT OF THE UNITED STATES,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE NISKANEN CENTER AS *AMICUS CURIAE* IN SUPPORT OF THE PETITION FOR WRIT OF CERTIORARI contains 2,608 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.

Executed on August 7, 2020

M. Patrick Yingling

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