

**No. 20-812**

LISA M. FOLAJTAR,  
*Petitioner,*  
*v.*

JEFFREY A. ROSEN, ACTING ATTORNEY GENERAL, ET AL.,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute, Reason Foundation, Individual Rights Foundation, and Independence Institute as *Amici Curiae* in Support of Petitioner contains 5,040 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*