

**No. 21-541**

TRAVIS TUGGLE,  
*PETITIONER,*  
*v.*

UNITED STATES OF AMERICA,  
*RESPONDENT.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute and Rutherford Institute as Amici Curiae in Support of Petitioner contains 5,752 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*