

No. 25-331

In the Supreme Court of the United States

PATRICK WAYMAN SCULLARK, JR.,

Petitioner,

v.

STATE OF IOWA,

Respondent.

*On Petition for a Writ of Certiorari to the
Iowa Supreme Court*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 3,119 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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