

In the Supreme Court of the United States

KATE ADAMS, PETITIONER

v.

COUNTY OF SACRAMENTO; SCOTT JONES, SHERIFF

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Cato Institute as Amicus Curiae Supporting Petitioner in *Adams v. County of Sacramento*, S. Ct. No. 25-672, complies with the word limitations, because it contains 5,874 words, excluding the parts of the document exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2026



Parker Rider-Longmaid