

No. 26-93

In the Supreme Court of the United States

JOHN REAM,

Petitioner,

v.

U.S. DEPARTMENT OF THE TREASURY, ET AL.,

Respondents.

*On Petition for Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit*

**CERTIFICATE OF COMPLIANCE
WITH WORD LIMITATIONS**

As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Petitioner contains 5,857 words, excluding the parts of the brief that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ilya Shapiro

Ilya Shapiro

Counsel of Record

August 20, 2026