

In the Supreme Court of the United States

JOHN REAM,

Petitioner,

v.

U.S. DEPARTMENT OF THE TREASURY, et al.,

Respondents.

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

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 4,787 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Thomas A. Berry

Counsel of Record

CATO INSTITUTE

1000 Mass. Ave., N.W.

Washington, DC 20001

(443) 254-6330

tberry@cato.org

August 20, 2026