

No. 23-1324

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**In the Supreme Court of the United States**

THOMAS PERTTU,

*Petitioner,*

*v.*

KYLE BRANDON RICHARDS,

*Respondent.*

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

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**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 Respondent contains 3,322 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Clark M. Neily III

*Counsel of Record*

CATO INSTITUTE

1000 Mass. Ave., N.W.

Washington, DC 20001

(202) 425-7499

cneily@cato.org

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