In the Supreme Court of the United States

MICHAEL QUINN SULLIVAN,

Petitioner,

v.

TEXAS ETHICS COMMISSION,

Respondents.

On Petition for Writ of Certiorari to the Supreme Court of the United States

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 Petitioners contains 2,207 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 18, 2025.

/s/ Ilya Shapiro____

Ilya Shapiro Counsel of Record