In the Supreme Court of the United States

MICHAEL QUINN SULLIVAN,

Petitioner,

v.

TEXAS ETHICS COMMISSION,

Respondent.

On Petition for a Writ of Certiorari to the Texas Court of Appeals, Third District

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute and Foundation for Individual Rights and Expression as *Amici Curiae* in Support of Petitioner contains 2,571 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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February 18, 2025