

No. 19-1301

CLYDE S. BOVAT,

Petitioner,

v.

VERMONT,

Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae National Association for Public Defense in Support of Petitioner contains 4093 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Thomas M. Bondy
Counsel of Record