IN THE

Supreme Court of the United States

ROBERT A. PEREZ,

Petitioner,

v.

STATE OF COLORADO,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 4,731 words, excluding the parts of the document 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 July 13, 2020.

Brianne J. Gorod

Counsel for Amicus Curiae