IN THE

Supreme Court of the United States

Robert A. Perez, Petitioner, v. $State\ of\ Colorado,$ Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE SUPREME COURT OF COLORADO

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Kendall Turner, a member of the bar of this Court, certify on this 25th day of September 2020, that the Reply Brief for Petitioner in the above-captioned case contains 2,871 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Kendall Turner Kendall Turner