

CERTIFICATE OF COMPLIANCE

No. 19-223

JANICE SMYTH, *Petitioner*

v.

CONSERVATION COMMISSION OF FALMOUTH, *et al.*, *Respondents*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Center for Constitutional Jurisprudence in support of Petitioner in the above-referenced cases contains 2,605 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 September 18, 2019

A handwritten signature in black ink, appearing to read 'Eastman', is written over a horizontal line.

John C. Eastman
Counsel for *Amici Curiae*
Center for Constitutional
Jurisprudence