

CERTIFICATE OF COMPLIANCE

No. 19-285

JERUD BUTLER, *Petitioner*,

v.

BOARD OF COUNTY COMMISSIONERS FOR
SAN MIGUEL COUNTY, *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 2,805 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 October 2, 2019



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