## IN THE

## Supreme Court of the United States

JERUD BUTLER,

Petitioner,

v.

BOARD OF COUNTY COMMISSIONERS FOR SAN MIGUEL COUNTY, ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Tenth Circuit

BRIEF OF THE GOVERNMENT ACCOUNTABILITY PROJECT AS AMICUS CURIAE IN SUPPORT OF PETITIONER

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,367 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 October 3, 2019.

Colin Casey Hogan

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