## In the

## Supreme Court of the United States

PETER BRET CHIAFALO, LEVI JENNET GUERRA, AND ESTHER VIRGINIA JOHN.

Petitioners,

v. State of Washington,

Respondent.

COLORADO DEPARTMENT OF STATE,

Petitioner,

MICHEAL BACA, POLLY BACA, AND ROBERT NEMANICH,

Respondents.

On Writs of Certiorari to the Supreme Court of Washington and the United States Court of Appeals for the Tenth Circuit

Brief of Professor Derek T. Muller as *amicus* curiae in support of neither party

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,948 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 March 6, 2020

Ian Speir, Nussbaum Speir Gleason PLLC