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,

V.

MICHAEL BACA, POLLY BACA, AND ROBERT NEMANICH,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Making Every Vote Count Foundation as *Amicus Curiae* in Support of Neither Side in the above-captioned consolidated cases contains 3,922 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 9, 2020.

Jerrold J. Ganzfried Counsel of Record

GANZFRIED/LAW

5335 Wisconsin Avenue, NW

Suite 440

Washington, DC 20015 JJG@ganzfriedlaw.com

(202) 486-2004