No. 19-465

IN THE SUPREME COURT OF THE UNITED STATES

PETER BRET CHIAFALO, ET AL.,

Petitioners,

v.

STATE OF WASHINGTON,

Respondent.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen in Support of Respondent contains 4,219 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on April 7, 2020.

Acot I Ulan

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