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Nos. 19-465, 19-518

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

> v. STATE OF WASHINGTON, Respondent.

COLORADO DEPARTMENT OF STATE, Petitioner,

v. MICHEAL 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 AMICUS CURIAE INDEPENDENCE INSTITUTE IN SUPPORT OF THE PRESIDENTIAL ELECTORS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 5431 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 6th day of March, 2020. I am duly authorized under the laws of the State of Nebraska to administer oaths.

GENERAL NOTARY-State of Nebraska
RENEE J. GOSS
My Comm. Exp. September 5, 2023

Renee g. Lloss
Notary Public

andrew H. Cokle

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