

No. 22-138

IN THE
Supreme Court of the United States

BILLY RAYMOND COUNTERMAN,

Petitioner,

v.

PEOPLE OF THE STATE OF COLORADO,

Respondent.

On Writ of Certiorari to the Colorado Court of
Appeals, Division II

**CERTIFICATE OF COMPLIANCE WITH
WORD-COUNT LIMITATIONS**

I, Bruce D. Brown, counsel for amicus curiae and a member of the Bar of this Court, certify that the Brief of Amicus Curiae the Reporters Committee for Freedom of the Press in Support of Petitioner contains 2,857 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

Date: March 1, 2023

/s/ Bruce D. Brown