In the Supreme Court of the United States

BILLY RAYMOND COUNTERMAN, $Petitioner,\\ v.$ Colorado,

Respondent.

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

CERTIFICATE OF COMPLIANCE

Pursuant to Rule 33(h), I hereby certify that this Brief of Legal Momentum, the National Crime Victim Law Institute, Aequitas, and Companion *Amici Curiae* in Support of Respondent contains 3,682 words as counted by Microsoft Word, and therefore complies with the word count limits set out in Rule 33.

Date: March 30, 2023

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