

No. 22-138

IN THE
Supreme Court of the United States

BILLY RAYMOND COUNTERMAN,

Petitioner,

v.

THE PEOPLE OF THE STATE OF COLORADO,


Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of First Amendment Scholars as *Amici Curiae* in Support of Respondent in *Counterman v. Colorado*, No. 22-138, complies with the word limitations, as it contains 6,933 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 31, 2023



Jeffrey R. Johnson