

22-138

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 certify that the Brief of the Cato Institute and Rutherford Institute as *Amici Curiae* Supporting Petitioner contains 5,174 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 28, 2023

/s/ Jay R. Schweikert
Counsel of Record