

IN THE  
*Supreme Court of the United States*

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GEORGE SHEETZ,  
*Petitioner,*

v.

COUNTY OF EL DORADO, CALIFORNIA,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the **BRIEF OF CITIZEN ACTION DEFENSE FUND AS AMICUS CURIAE IN SUPPORT OF PETITIONER** in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains **3,367** words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

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