## IN THE

## Supreme Court of the United States

MICAH JESSOP; BRITTAN ASHJIAN,

Petitioners,

v.

CITY OF FRESNO, ET AL.,

Respondents.

## RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioners contains 5,943 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on April 13, 2020.

Brianne J. Gorod

Counsel for Amicus Curiae