

No. 19-670

IN THE
Supreme Court of the United States

ARNOLD FLECK,

PETITIONER,

V.

JOE WETCH, ET AL.,

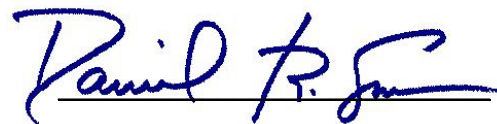
RESPONDENTS.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Liberty Justice Center & Mackinac Center supporting petitioner's application for certiorari contains 3,306 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 December 19, 2019



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