

No. 21-1231

In the Supreme Court of the United States

PRISCILLA LEFEBURE, *Petitioner*,

v.

SAMUEL D'AQUILLA, INDIVIDUALLY AND IN
HIS OFFICIAL CAPACITY AS DISTRICT ATTORNEY

CERTIFICATE OF WORD COUNT

Pursuant to Supreme Court Rule 33.1(h), I, Gene C. Schaerr, a member of the Bar of this Court, hereby certify that the Brief of American Conservative Union As *Amicus Curiae* Supporting Petitioner complies with the word limitation of Supreme Court Rule 33.1(g) contains 5,911 words, including the parts of the brief that are required, or those parts exempted by Supreme Court Rule 33.1(d).

/s/Gene C. Schaerr
GENE C. SCHAERR
Counsel of Record
SCHAERR | JAFFE LLP
1717 K Street NW, Suite 900
Washington, DC 20006
(202) 787-1060
gschaerr@schaerr-jaffe.com

Counsel for Amicus Curiae

April 11, 2022