

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. SCHAEERR  
*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