## IN THE

## Supreme Court of the United States

JASCHA CHIAVERINI, ET AL.,

Petitioners,

v.

CITY OF NAPOLEON, OHIO, ET AL.,

Respondents.

## CERTIFICATE OF SERVICE

I, Brian R. Frazelle, do hereby declare that on February 7, 2024, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of the Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioners on counsel for each party to the above proceedings as follows:

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Counsel of Record for Petitioners Jascha Chiaverini, et al. Counsel of Record for Respondents City of Napoleon, Ohio, et al.

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

Executed on February 7, 2024.

/s/ Brian R. Frazelle
Brian R. Frazelle
Counsel for Amicus Curiae