In the Supreme CourtO of the United States

JASCHA CHIAVERINI, ET AL.,

Petitioner,

v.s

NICHOLAS EVANOFF, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Charles Rothfeld, counsel for *Amicus Curiae* and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief for National Police Accountability Project as *Amicus Curiae* Supporting Petitioners contains 5677 words, excluding the parts of the Brief that are exempted by Rule 33.1(d).

Dated: Washington, D.C.

February 7, 2024

/s/ Charles Rothfeld
CHARLES ROTHFELD
Counsel of Record