

No. 20-1214

**In the Supreme Court of the United States**

Fred J. Eychaner,

*Petitioner,*

v.

City of Chicago,

*Respondent.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the *Amicus Curiae* Brief of the Liberty Justice Center In Support of Petitioner contains 2,976 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 April 13, 2021

/s/ Jeffrey M. Schwab

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