

No. 20-391

JODY LOMBARDO, ET AL.,

Petitioners,

v.

CITY OF ST. LOUIS, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Policing Scholars Amici Curiae Brief in Support of Petitioners contains 5,964 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Melanie L. Bostwick
Counsel of Record