

No. 23-50

IN THE
Supreme Court of the United States

JASCHA CHIAVERINI, ET AL.,

Petitioners,

v.

CITY OF NAPOLEON, OHIO, ET AL.,

Respondents.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioners contains 6,904 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 February 7, 2024.

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