

CERTIFICATE OF COMPLIANCE

No. 25-238, *Viramontes v. Cook County*

No. 25-566, *Grant v. Higgins*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amici curiae* Professor Gary Kleck and FPC Action Foundation contains 7,144 words, excluding the parts of the brief 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 September 4, 2026

/s/ *Bradley A. Benbrook*

Bradley A. Benbrook

Counsel for *Amici Curiae*