

IN THE
Supreme Court of the United States

DONALD J. TRUMP, ET AL.,

Applicants,

v.

STATE OF ILLINOIS AND CITY OF CHICAGO,

Respondents.

CERTIFICATE OF SERVICE

I, Brian R. Frazelle, do hereby declare that on October 20, 2025, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of the Constitutional Accountability Center as *Amicus Curiae* in Support of Respondents on counsel for each party to the above proceedings as follows:

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I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 20, 2025.

/s/ Brian R. Frazelle
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