

CERTIFICATE OF COMPLIANCE

No. 19-251

AMERICANS FOR PROSPERITY FOUNDATION,

Petitioner.

v.

Xavier Becerra, Attorney General of California, Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of American Target Advertising, Inc. in Support of Petitioner contains 5,057 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 25, 2019.

Donna J. Wolf

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: John 25 7019

Notary Public

[seal]

JULIE ANNE KERSHNER Notary Public, State of Ohio

My Commission Expires February 21, 2023