

CERTIFICATE OF COMPLIANCE

Nos. 19-251 & 19-255

AMERICANS FOR PROSPERITY FOUNDATION,

Petitioner,

v.

XAVIER BECERRA, ATTORNEY GENERAL OF CALIFORNIA,

Respondent.

THOMAS MORE LAW CENTER,

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 Citizens United and Citizens United Foundation in Support of Petitioners contains 7,540 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 March 1, 2021.

Emily Mullins

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

Date: March 1, 2021

John B. Durly

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023