

CERTIFICATE OF COMPLIANCE

No. 19-532

UNITED STATES OF AMERICA,

Petitioner,

V.

STATE OF CALIFORNIA, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for *Amicus Curiae* the National Sheriffs' Association in Support of Petitioner contains 2,934 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 November 22, 2019.

Donna J. Wolf

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

Novem 22, 2019 Notary Public

[seal]

JULIE ANNE KERSHNER Notary Public, State of Ohio My Commission Expires February 21, 2023