



CERTIFICATE OF COMPLIANCE

No. 20-1775

ARIZONA, ET AL.,

*Petitioners,*

v.

CITY AND COUNTY OF SAN FRANCISCO,  
CALIFORNIA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for America First Legal Foundation as *Amicus Curiae* in Support of Petitioners contains 4,975 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 December 17, 2021.

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

Date: December 17, 2021

John D. Gallagher  
Notary Public

[seal]



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