

## CERTIFICATE OF COMPLIANCE

No. 20-7474

EZRALEE J. KELLEY,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave contains 185 words and the Brief for Americans for Prosperity Foundation and Rutherford Institute as *Amici Curiae* in Support of Petitioner contains 4,202 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 May 5, 2021.



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

Date: May 5, 2021

John D. Gallagher

Notary Public

[seal]



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