



CERTIFICATE OF COMPLIANCE

No. 21-1084

JANET HELTZEL, *ET AL.*,

Petitioners,

v.

GLENN A. YOUNGKIN, *ET AL.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of America's Future, Intercessors for America, Conservative Legal Def. and Ed. Fund, U.S. Constitutional Rights Legal Def. Fund, Constitution Party National Committee, Eagle Forum, Eagle Forum Foundation, Fitzgerald Griffin Fdn., Restoring Liberty Action Committee, and Virginia State Senator Richard H. Black (ret.) in Support of Petitioners contains 5,959 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 9, 2022.

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

Date: March 9, 2022

John D. Gallagher

Notary Public

[seal]



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