



CERTIFICATE OF COMPLIANCE

No.

SAMUEL ARMSTRONG,

*Petitioner,*

v.

GAVIN NEWSOM; DOES, 1 THROUGH 50,  
IN THEIR INDIVIDUAL CAPACITIES, INCLUSIVE,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 4,138 words, excluding the parts of the Petition 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 16, 2022.

  
\_\_\_\_\_  
Heather Campbell  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: May 16, 2022

John D. Gallagher

Notary Public

[seal]



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