

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
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