IN THE

Supreme Court of the United States

JONATHAN SAVAS, et al.,

Petitioners,

v.

CALIFORNIA STATEWIDE LAW ENFORCEMENT AGENCY, et al.,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

AMICUS CURIAE BRIEF OF THE FAIRNESS CENTER IN SUPPORT OF PETITIONERS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 1,600 words, excluding the parts of the document 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 2, 2022.

Alan James Smith

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