

**In the
Supreme Court of the United States**

AMERICAN PETROLEUM INSTITUTE, ET AL.,

Petitioners,

v.

MINNESOTA,

Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Brief of American Free Enterprise Chamber of Commerce as Amicus Curiae in Support of Petitioners contains 5,417 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed September 20, 2023.

/s/ Jonathan Berry

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