



**CERTIFICATE OF COMPLIANCE**

No. 17-494

SOUTH DAKOTA,

*Petitioner,*

v.

WAYFAIR, INC., OVERSTOCK.COM, INC.,  
AND NEWEGG, INC.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for *Amici Curiae* National Taxpayers Union Foundation, Americans for Prosperity, FreedomWorks, Freedom Partners Chamber of Commerce, and Institute for Policy Innovation in Support of Respondents contains 8,976 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 April 4, 2018.

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

Date: April 4, 2018

J.A. Kershner

Notary Public

[seal]



**JULIE ANNE KERSHNER**  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2023