

CERTIFICATE OF COMPLIANCE

I hereby certify that the accompanying Brief of Pacific Research Institute and Project for Privacy and Surveillance Accountability as *Amici Curiae* in Support of Petitioner in Americans for Prosperity Foundation v Becerra, No. 19-251 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 4,012 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe