



CERTIFICATE OF COMPLIANCE

Nos. 19-251 & 19-255

AMERICANS FOR PROSPERITY FOUNDATION,

Petitioner,

v.

XAVIER BECERRA, ATTORNEY GENERAL OF
CALIFORNIA,

Respondent.

THOMAS MORE LAW CENTER,

Petitioner,

v.

XAVIER BECERRA, ATTORNEY GENERAL OF
CALIFORNIA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Nonprofit Alliance Foundation, People for the Ethical Treatment of Animals, Association of Fundraising Professionals, and 123 Nonprofit Organizations Listed in Appendix as *Amici Curiae* in Support of Petitioners contains 7,976 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 March 1, 2021.



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

Date: March, 2021

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023