



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 Protect the 1st and Pacific Research Institute as *Amici Curiae* Supporting Petitioner contains 4,936 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 1, 2021

John D. Gallagher

Notary Public

[seal]



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