

No. 20-1775

In the Supreme Court of the United States

ARIZONA, ET AL.,

Petitioners,

v.

CITY AND COUNTY OF SAN FRANCISCO, CALIFORNIA, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF *AMICI CURIAE* STATES OF OHIO, ALASKA, KENTUCKY, AND NEBRASKA IN SUPPORT OF PETITIONERS contains 4,303 words, excluding the parts of the document 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 December 20, 2021.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General