

No. 21-226

In the Supreme Court of the United States

LIBERTARIAN PARTY OF OHIO AND HAROLD THOMAS,

Petitioners,

v.

DON MICHAEL CRITES, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF IN OPPOSITION contains 8,244 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 September 20, 2021.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General

Counsel for Respondents

Don Michael Crites, et al.