

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 OP-
POSITION contains 8,244 words, excluding the parts of the document that are ex-
empted 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.