



CERTIFICATE OF COMPLIANCE

No. 22-1199

ROGAN O'HANDLEY,

Petitioner,

v.

SHIRLEY N. WEBER, CALIFORNIA SECRETARY OF
STATE, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Petition for Writ of Certiorari contains 5,197 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 12, 2023.

Donna J. Moore

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

Date: July 12, 2023

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2026