



CERTIFICATE OF COMPLIANCE

No. 22-592

ARIZONA, ET AL.,

Petitioners,

v.

ALEJANDRO MAYORKAS, SECRETARY OF HOMELAND
SECURITY, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Citizens United, Citizens United Foundation, and The Presidential Coalition as *Amici Curiae* in Support of Petitioners contains 6,109 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 January 20, 2023.



Emily Mullins
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: January 20, 2023

John D. Gallagher

Notary Public

[seal]



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