



**CERTIFICATE OF COMPLIANCE**

No. 22-976

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.,  
*Petitioners,*

v.

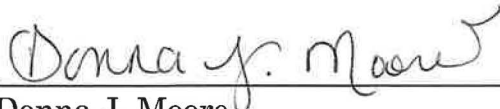
MICHAEL CARGILL,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the *Amicus Curiae* Brief of the Buckeye Institute in Support of Respondent contains 4,084 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.

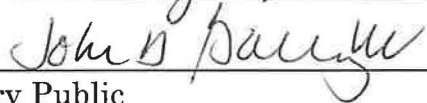
Executed on January 23, 2024.



Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
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(800) 890-5001

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

Date: Jan 23, 2024

  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028