

CERTIFICATE OF COMPLIANCE

Nos. 21-1086, *Merrill v. Milligan*
21-1087, *Merrill v. Caster*

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amici curiae Citizens United*, et al., contains 4,698 words, excluding the parts of the brief 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 May 2, 2022

/s/ Stephen M. Duvernay
Stephen M. Duvernay
Counsel for *Amici Curiae*