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No. 21-1454

THE OHIO ADJUTANT  
GENERAL'S DEPARTMENT, et al.,  
Petitioners,  
v.  
FEDERAL LABOR RELATIONS AUTHORITY, et al.,  
Respondents.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMERICA FIRST POLICY INSTITUTE AS AMICUS CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4645 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 15th day of November, 2022.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant