



CERTIFICATE OF COMPLIANCE

Nos. 22-506, 22-535

JOSEPH R. BIDEN, PRESIDENT OF THE
UNITED STATES, ET AL.,

Petitioners,

v.

NEBRASKA, ET AL.,

Respondents.

DEPARTMENT OF EDUCATION, ET AL.,

Petitioners,

v.

MYRA BROWN, ET AL.,

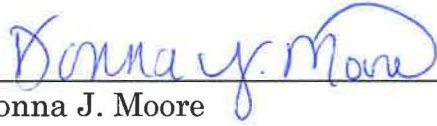
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Foundation for Government Accountability in Support of Respondents contains 2,911 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.

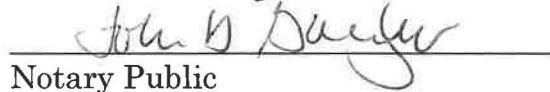
Executed on February 1, 2023.



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

Date: February 1, 2023


Notary Public

[seal]



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