

No. 22-614

In the Supreme Court of the United States

TROY CHRISMAN, ET AL.,

Petitioners,

v.

ESTATE OF SETH MICHAEL ZAKORA, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF *AMICI CURIAE* STATES OF OHIO, KENTUCKY, AND TENNESSEE IN SUPPORT OF PETITIONERS contains 3,205 words, excluding the parts of the document 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 March 22, 2023.

/s/ Benjamin M. Flowers

BENJAMIN M. FLOWERS

Ohio Solicitor General