



CERTIFICATE OF COMPLIANCE

No. 22-912

JAMES KING,

*Petitioner,*

v.

DOUGLAS BROWNBACK; TODD ALLEN,

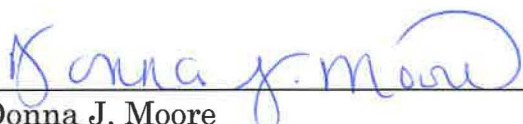
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professors James E. Pfander, Gregory C. Sisk, and Zachary D. Clopton as *Amici Curiae* in Support of Petitioner contains 5,966 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 April 17, 2023.

  
\_\_\_\_\_  
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: April 17, 2023  
  
\_\_\_\_\_  
Notary Public

[seal]



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