



**CERTIFICATE OF COMPLIANCE**

No. 22-92

MICHAEL BANERIAN, ET AL.,

*Appellants,*

v.

JOCELYN BENSON, MICHIGAN SECRETARY OF STATE,  
ET AL.,

*Appellees.*

As required by Supreme Court Rule 33.1(h), I certify that the Motion to Dismiss or Affirm contains 3,766 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 September 30, 2022.

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

Date: September 30, 2022

John D Gallagher

Notary Public

[seal]



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