

No. 22-976

MERRICK B. GARLAND, ATTORNEY GENERAL, et al.,

Petitioners,

v.

MICHAEL CARGILL,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF *AMICUS CURIAE* FPC ACTION FOUNDATION IN SUPPORT OF RESPONDENT in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that this brief contains 4,346 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 29, 2024.

/s/ Joseph G.S. Greenlee

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FPC Action Foundation