

IN THE
Supreme Court of the United States

DONALD J. TRUMP, ET AL.,

Petitioner,

v.

FRITZ EMMANUEL LESLY MIOT, ET AL.,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that on this 16th day of March, 2026, the brief of a bipartisan group of former Ohio Attorneys General contains 4,813 words and complies with the word-limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: March 16, 2026

/s/ Richard W. Mark
Richard W. Mark