
IN THE
SUPREME COURT OF THE UNITED STATES

AMERICANS FOR CITIZEN VOTING – MICHIGAN and FRED SMITH,

Applicants,

v.

MICHIGAN BOARD OF STATE CANVASSERS, SECRETARY OF STATE JOCELYN BENSON, and
DIRECTOR OF ELECTIONS JONATHAN BRATER,

Respondents.

CERTIFICATE OF SERVICE

I, Michael F. Smith, hereby certify that I filed the Brief of *Amicus Curiae* Initiative and Referendum Institute in Support of Applicants in this case electronically with the Court; that I have sent three (3) copies of that filing to the Clerk of the Court today via First-Class U.S. Mail; and that I served a copy of that filing upon John Bursch and Ann Maurine Sherman, counsel for the respective parties, at their email addresses (jbursch@burschlaw.com and shermana@michigan.gov) on September 3, 2026.

Respectfully submitted,

THE SMITH APPELLATE LAW FIRM

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September 3, 2026