



**CERTIFICATE OF COMPLIANCE**

No. 23-1084

JILL HILE, ET AL.,

*Petitioners,*

v.

MICHIGAN, ET AL.,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* The Foundation for Government Accountability in Support of Petitioners contains 4,228 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 May 8, 2024.

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

Date: May 8, 2024

John D. Gallagher  
Notary Public

[seal]



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