



CERTIFICATE OF COMPLIANCE

No. 20-427

POLK COUNTY,

Petitioner,

v.

J.K.J. AND M.J.J.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* for the National Association of Counties, the National League of Cities, the U.S. Conference of Mayors, the International City/County Management Association, and the International Municipal Lawyers Association in Support of the Petitioner contains 3,906 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 November 2, 2020.

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

Date: November 2, 2020

John S. Gallagher
Notary Public

[seal]



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