



**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

MICHIGAN EDUCATION ASSOCIATION FAMILY RETIRED  
STAFF ASSOCIATION, GLENNA PARKER,  
AND CAROLEE SMITH,

*Petitioners,*

v.

MICHIGAN EDUCATION ASSOCIATION, MICHIGAN  
EDUCATION SPECIAL SERVICES ASSOCIATION, AND  
MEA FINANCIAL SERVICES, INC.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I  
certify that the Petition for Writ of Certiorari contains  
3,686 words, excluding the parts of the Petition 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 October 21, 2021.

Heather Campbell  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: October 21, 2021

John D. Gallagher  
Notary Public

[seal]



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