



**CERTIFICATE OF COMPLIANCE**

No. 22-1025

SYLVIA GONZALEZ,

*Petitioner,*

v.

EDWARD TREVINO, II, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Texas Association of Counties and Major County Sheriffs of America in Support of Respondents contains 3,909 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 January 31, 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: January 31, 2024  
John D. Gallagher  
Notary Public

[seal]



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