

# Certificate of Compliance

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

BENEFIT STRATEGIES WEST, INC. and  
LESLIE MANN-DAMON,

*Petitioners,*

v.

ROGER NAUMANN et al.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 7,001 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 April 30, 2023.

  
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