

## CERTIFICATE OF COMPLIANCE

No. 22-1074

GEORGE SHEETZ,

Petitioner,

V.

COUNTY OF EL DORADO, CALIFORNIA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae the Buckeye Institute in Support of Petition for Writ of Certiorari contains 3,799 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 June 5, 2023.

Donna J. Moore

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.

Data

Notary Public

[seal]

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