



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 *Amici Curiae* the Buckeye Institute and National Federation of Independent Business Small Business Legal Center, Inc. in Support of Petitioner contains 3,933 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 November 20, 2023.

Donna J. Moore

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

Date: November 20, 2023

John D. Gallagher
Notary Public

[seal]



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