

CERTIFICATE OF COMPLIANCE

No. 22-166

IN THE
Supreme Court of the United States

GERALDINE TYLER,

Petitioner,

v.

HENNEPIN COUNTY, MINNESOTA and MARC V. CHAPIN, AUDITOR-TREASURER, in his
official capacity,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case contains 2,734 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henschman, declare under penalty of perjury that the foregoing is true and correct. Executed on September 16, 2022.



JOSEPH D. HENCHMAN

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