



CERTIFICATE OF COMPLIANCE

No. 22-166

GERALDINE TYLER,

*Petitioner,*

v.

HENNEPIN COUNTY, MINNESOTA, *et al.*,

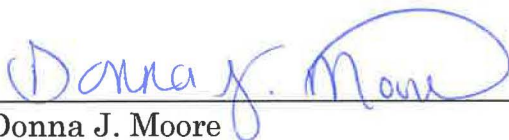
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Local Government Legal Center, National Association of Counties, National League of Cities, International Municipal Lawyers Association, and Government Finance Officers Association in Support of Respondents contains 6,988 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.

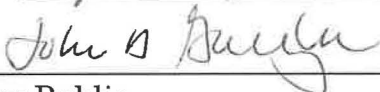
Executed on April 5, 2023.



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.

Date: April 5, 2023

  
\_\_\_\_\_  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2026