

## CERTIFICATE OF COMPLIANCE

No. 22-227

LAC DU FLAMBEAU BAND OF LAKE SUPERIOR CHIPPEWA INDIANS, ET AL.,

Petitioners,

v.

BRIAN W. COUGHLIN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Native American Financial Services Association as *Amicus Curiae* in Support of Petitioners contains 3,263 words, excluding the parts of the Brief 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 October 12, 2022.

Max. mod

Donna J. Wolf

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

Date:

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023