



**CERTIFICATE OF COMPLIANCE**

No. 22-611

KEVIN LINDKE,

*Petitioner,*

v.

JAMES R. FREED,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Local Government Legal Center, National Association of Counties, National League of Cities, and the International Municipal Lawyers Association as *Amici Curiae* In Support of Neither Party contains 5,825 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 30, 2023.



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

Date: June 30, 2023

John D. Gallagher  
Notary Public

[seal]



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