



CERTIFICATE OF COMPLIANCE

No. 22-720

DAKOTA FINANCE LLC, DBA ARABELLA FARM, ET AL.,
Petitioners,

v.

NATURALAND TRUST, ET AL.,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Southeastern Legal Foundation in Support of Petitioners contains 3,661 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 March 3, 2023.



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

Date: March 3, 2023

John D. Gallagher
Notary Public

[seal]



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