



CERTIFICATE OF COMPLIANCE

No. 23-1181

GAIL M. RITCHEY,

Petitioner,

v.

STATE OF OHIO,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Office of the Ohio Public Defender in Support of Petitioner contains 2,416 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 May 30, 2024.

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

Date: May 30, 2024
John D. Gallagher
Notary Public

[seal]



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