



CERTIFICATE OF COMPLIANCE

No. 23-270

COUNTY OF TULARE, ET AL.,

Petitioners,

v.

JOSE MURGUIA, FOR HIMSELF AND FOR THE ESTATES
OF MASON AND MADDOX MURGUIA, ET AL.,

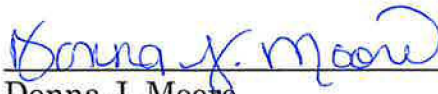
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* the National Sheriffs' Association, Major County Sheriffs of America, California State Sheriffs' Association, California Police Chiefs Association, and California Peace Officers' Association in Support of Petitioners contains 5,213 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.

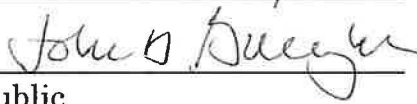
Executed on October 20, 2023.



Donna J. Moore
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(800) 890-5001

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

Date: October 20, 2023



Notary Public

[seal]



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