

CERTIFICATE OF COMPLIANCE

No.

BRANDON HOLTAN, DANA WINGERT, AND THE
CITY OF DES MOINES, IOWA

Petitioners,

v.

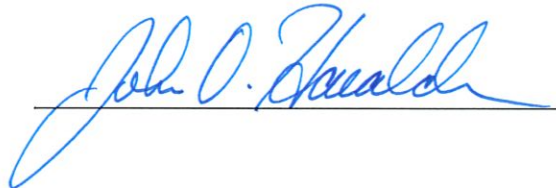
MARK EDWARD NIETERS,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 4,016 words, excluding the parts of the petition 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 February 7, 2024

A handwritten signature in blue ink, appearing to read "John O. Hualde", is written over a horizontal line.