



**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

WEST FLAGLER ASSOCIATES, LTD., *et al.*,

*Petitioners,*

v.

DEBRA HAALAND, *et al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,933 words, excluding the parts of the Petition 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 February 8, 2024.

Donna J. Moore  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: February 8, 2024  
John D. Gallagher  
Notary Public

[seal]



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