



CERTIFICATE OF COMPLIANCE

No. 23-862

WEST FLAGLER ASSOCIATES, LTD., dba Magic City
Casino, *et al.*,

Petitioners,

v.

DEBRA HAALAND, Secretary of the Interior, *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Daniel Wallach in Support of Petition for Writ of Certiorari contains 6,000 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 19, 2024.

Donna J. Moore
Donna J. Moore

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

Date: February 19, 2024

John D. Gallagher
Notary Public

[seal]



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