



CERTIFICATE OF COMPLIANCE

No. 23-926

NO ON E, SAN FRANCISCANS OPPOSING THE
AFFORDABLE CARE HOUSING PRODUCTION ACT, ET AL.,
Petitioners,

v.

DAVID CHIU, IN HIS OFFICIAL CAPACITY AS SAN
FRANCISCO CITY ATTORNEY, ET AL.,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* The Buckeye Institute in Support of Petitioners contains 4,030 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 March 28, 2024.

Donna J. Moore

Donna J. Moore
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: March 28, 2024

John D. Gallagher
Notary Public

[seal]



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