



CERTIFICATE OF COMPLIANCE

No. 22-166

GERALDINE TYLER,

*Petitioner,*

v.

HENNEPIN COUNTY, MINNESOTA, *et al.*,

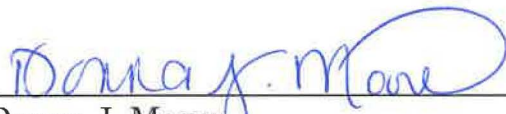
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Michigan Association of Counties and the Michigan Association of County Treasurers as *Amici Curiae* in Support of Respondents contains 7,053 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

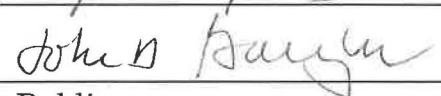
State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 5, 2023.

  
\_\_\_\_\_  
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: April 5, 2023  
  
\_\_\_\_\_  
Notary Public

[seal]



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