



**CERTIFICATE OF COMPLIANCE**

No. 22-324

MICHELLE O'CONNOR-RATCLIFF, ET AL.,

*Petitioners,*

v.

CHRISTOPHER GARNIER, ET UX.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Protect the First Foundation as *Amicus Curiae* Supporting Respondents contains 3,732 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 August 15, 2023.

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: August 15, 2023

John D. Gallagher  
Notary Public

[seal]



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