



**CERTIFICATE OF COMPLIANCE**

No. 22-720

DAKOTA FINANCE LLC, DBA ARABELLA FARM, ET AL.,  
*Petitioners,*

v.


NATURALAND TRUST, ET AL.,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* the Buckeye Institute and the Cato Institute in Support of Petitioners contains 3,217 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

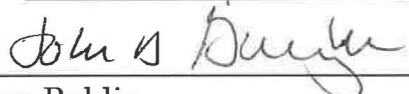
I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on March 3, 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: March 3, 2023

  
\_\_\_\_\_  
Notary Public

[seal]



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