



CERTIFICATE OF COMPLIANCE

No. 23-74

DEBRA A. VITAGLIANO,

Petitioner,

v.

COUNTY OF WESTCHESTER, NEW YORK,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Ethics and Public Policy Center in Support of Petitioner contains 5,761 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 24, 2023.

Donna J. Moore

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

Date: August 24, 2023

John D. Gallagher
Notary Public

[seal]



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