



**CERTIFICATE OF COMPLIANCE**

No. 23-914

DIANE ZILKA,

*Petitioner,*

v.

CITY OF PHILADELPHIA, TAX REVIEW BOARD,

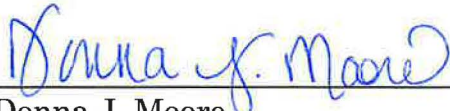
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the American College of Tax Counsel as *Amicus Curiae* In Support of Petitioner contains 4,380 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

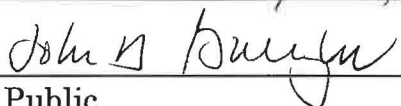
State of Ohio  
County of Hamilton

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

Executed on March 25, 2024.

  
\_\_\_\_\_  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
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(800) 890-5001

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

Date: March 25, 2024  
  
\_\_\_\_\_  
Notary Public

[seal]



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