

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Supreme Court Rule 33.1 (h) that the accompanying brief complies with the word-count limitation set forth in Rule 33.1. According to the word count tool in the WordPerfect X8 program the brief contains 3,201 words.

For the Vermont Association of Criminal Defense Attorneys,

23 August 2019

Date

A handwritten signature in blue ink, appearing to read "J. O'Hara", written over a horizontal line.

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