

## CERTIFICATION OF WORD COUNT

The attached Brief complies with the word limitations under Supreme Court Rule 33(g)(1). The number of words in the Brief including footnotes total 1607.

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

Executed on February 17, 2020.

A handwritten signature in black ink, appearing to be "J. D. [unclear]", is written over a horizontal line.