



**CERTIFICATE OF COMPLIANCE**

No. 21-1210

SCOTT COUNTY, TENNESSEE,

*Petitioner,*

v.

TAMMY BRAWNER,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Kentucky Jailers Association as *Amicus Curiae* in Support of Petitioner contains 4,074 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on April 4, 2022.

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

Date: April 4, 2022

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023