

CERTIFICATE OF COMPLIANCE

No. 21-499

CARLOS VEGA,

Petitioner.

V.

TERENCE B. TEKOH,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Association of Police Organizations in Support of Petitioner contains 3,529 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 November 3, 2021.

Emily Mullins

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

Date: Normbu 3, 2021
John, Buylu

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires
February 14, 20, 3