



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 4,402 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 March 7, 2022.

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

Date: March 7, 2022

John. Gallagher
Notary Public

[seal]



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