



CERTIFICATE OF COMPLIANCE

No. 22-450

GREGORY SHIELDS, SR.,

Petitioner,

v.

COMMONWEALTH OF KENTUCKY,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Rutherford Institute in Support of Petition for Certiorari contains 5,847 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

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

Executed on December 15, 2022.

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

Date: *December 15, 2022*

John D. Gallagher
Notary Public

[seal]



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