

No. 22-450

**In the Supreme Court of the United States**

GREGORY SHIELDS, SR.,  
*Petitioner(s),*

v.

COMMONWEALTH OF KENTUCKY,  
*Respondent(s).*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Richard D. Friedman as *Amicus Curiae* in Support of Petition for Certiorari contains 4,994 words, excluding the parts of the document 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 December 15, 2022.

/s/Richard D. Friedman  
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