

## CERTIFICATE OF WORD COUNT

I certify that the accompanying brief complies with S.Ct. R. 33, in that it is prepared using Century Schoolbook 12-pt typeface and contains 4195 words, excluding this certificate. This certificate was prepared in reliance on the word-count function of Microsoft Word, part of Microsoft Office Professional Plus 2016.

/s/ Thomas C. Riley, #13523  
Douglas County Public Defender