

**CERTIFICATE OF WORD COUNT**

**No. 25-1062**

Jessica Pitts, Officer, et al.,

*Petitioners,*

v.

Taylor Burke, As Special Administrator of the Estate of Thomas Gay, Deceased,

*Respondent.*

STATE OF MASSACHUSETTS )  
COUNTY OF NORFOLK ) SS.:

Being duly sworn, I depose and say:

1. That I am over the age of 18 years and am not a party to this action. I am an employee of the Supreme Court Press, the preparer of the document, with mailing address at 1089 Commonwealth Avenue, Suite 283, Boston, MA 02215.

2. That, as required by Supreme Court Rule 33.1(h), I certify that the NATIONAL SHERIFFS' ASSOCIATION AMICUS BRIEF contains 2165 words, including the parts of the brief that are required or exempted by Supreme Court Rule 33.1(d).

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

  
\_\_\_\_\_  
Lucas DeDeus

March 12, 2026