

No. 23-259

In The  
Supreme Court of the United States

---

LEWIS COUNTY, KENTUCKY, ET AL.,  
*Petitioners,*

v.

JULIE HELPHENSTINE,  
*Respondent.*

**CERTIFICATE OF WORD COUNT**

I hereby certify on this 11th day of October, 2023, that excluding those parts allowed by rule, the above referenced BRIEF OF AMICUS CURIAE THE VIRGINIA SHERIFFS ASSOCIATION AND THE KENTUCKY JAILERS ASSOCIATION IN SUPPORT OF PETITIONERS contains 4,256 words.

Respectfully submitted,

/s/ Captain Michael F Imprento

*Counsel of Record*

Staff Attorney

Norfolk Sheriff's Office

Administration

140 East St.

Norfolk , VA 23510

(757)664-4344

Michael.Imprento@Norfolk-Sheriff.com