



CERTIFICATE OF COMPLIANCE

No. 23-259

LEWIS COUNTY, KENTUCKY, ET AL.,

Petitioners,

v.

JULIE HELPHENSTINE, Administratrix of the Estate of
Christopher Dale Helphenstine and Guardian of
B.D.H., the minor son of Christopher Dale
Helphenstine,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Shelby County Sheriff's Office as *Amicus Curiae* in Support of Neither Party in Support of Petitioners contains 2,195 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 October 18, 2023.

Donna J. Moore

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

Date: *October 18, 2023*

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028