

CERTIFICATE OF COMPLIANCE No.

JAMES DENNIS,

Petitioner

v.

COMMONWEALTH OF VIRGINIA

Respondent

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,306 words, excluding the parts of the petition 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 April 1, 2021

A handwritten signature in black ink, appearing to be 'JD' with a horizontal line extending to the right.

James Dennis, *pro se*