

## CERTIFICATE OF COMPLIANCE

No. \_\_\_\_\_

THOMAS JEFFREY,

*Petitioner*

v.

COMMONWEALTH OF PENNSYLVANIA,

*Respondent*

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 5104 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 February 8, 2021

/s/ Matthew Ness

Matthew Ness, Esq.