

## CERTIFICATE OF COMPLIANCE

No. -

**MATTHEW WILLIAM GEORGE,**

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 8,937 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 August 6, 2020

/s/Dale R. Jensen  
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