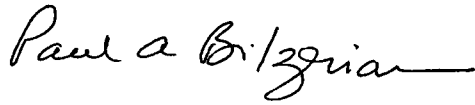


CERTIFICATE OF COMPLIANCE

Pursuant to Rule 33, I hereby certify that this Petition for a Writ of Certiorari complies with the type-volume limitation of 9,000 words. The number of words in this Petition is 3,464.

A handwritten signature in cursive script, reading "Paul A. Bilzerian", written in black ink. The signature is fluid and extends to the right with a long horizontal stroke.

Paul A. Bilzerian