

**CERTIFICATE OF COMPLIANCE**

**No.**

**Arthur O. Armstrong,**

**Petitioner,**

**vs.**

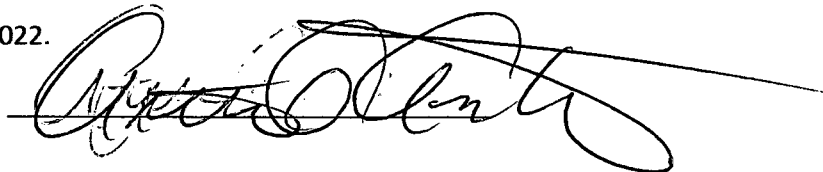
**State of Georgia, et al,**

**Respondents.**

As required by the Supreme Court Rule 33.1(h), I certify that petitioner's petition for writ of certiorari contains 2643 words, excluding the parts of the petition that are exempted by the Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 31, 2022.

A handwritten signature in black ink, appearing to read 'Arthur O. Armstrong', with a long horizontal flourish extending to the right.