

CERTIFICATE OF COMPLIANCE

Case No. _____

IN THE SUPREME COURT OF THE UNITED STATES

TONG PARK,

Petitioner,

v.

THE PEOPLE OF THE
STATE OF CALIFORNIA,

Respondent

On Petition for Writ of Certiorari to the
California State Supreme Court

As required by Supreme Court Rule 33.1(h), I certify that the petition for writ of certiorari contains 8,927 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 June 15, 2022, by



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