



## CERTIFICATE OF COMPLIANCE

No. \_\_\_\_

LEON A. BROWN IV,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,955 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

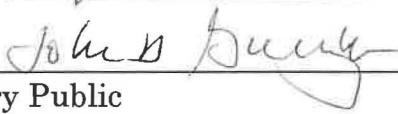
Executed on April 14, 2023.



Emily Mullins  
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(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: April 14, 2023

  
\_\_\_\_\_  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028