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## Supreme Court of the United States

JERRY WAYNE WILKERSON, et al.,

Petitioners,

V.

UNITED STATES OF AMERICA,

Respondent.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Petition for a Writ of Certiorari in *Wilkerson v. United States*, No. 22-\_\_\_\_, complies with the word limitations, as it contains 8,228 words.

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

Date: January 20, 2023

Andrew J.M. Bentz