
**In The
Supreme Court of the United States**

**DONALD V. WATKINS, SR.
Petitioner**

v.

**UNITED STATES OF AMERICA
Respondent**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 5788 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the foregoing certification is true and correct.

Executed on this 3rd day of March, 2023.

Donald V. Watkins

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