

CERTIFICATE OF COMPLIANCE

No. _____

WENDY H. DOWNS,

Pro Se Petitioner,

v.

JEFFREY MACOMBER, Secretary, California Department of Corrections and
Rehabilitation,

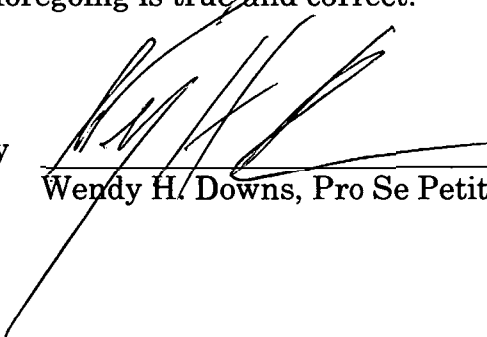
AND

ROB BONTA, The Attorney General of the State of California,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,999 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 17 JUNE 2025, by 
Wendy H. Downs, Pro Se Petitioner