

CERTIFICATE OF COMPLIANCE

No. 23 -

JAMES GIEHL
Petitioner,

v.

Bank of America
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 8,343 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: July 07, 2023

JAMES GIEHL