

### **Certificate of Compliance**

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that this petition for a writ of certiorari complies with the word limitation prescribed by Rule 33.

This petition contains **2,920 words**, excluding the parts of the petition that are exempted by Rule 33.1(d). The word count was determined using the word-count feature of the word-processing system used to prepare the document.

Respectfully submitted,

/s/Kiya Cunningham  
Kiya Cunningham