

No. \_\_\_\_\_

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

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MICHAEL J. McGOWAN,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

*On Petition for A Writ of Certiorari to the United  
States Court of Appeals for the Second Circuit*

**CERTIFICATE OF COMPLIANCE**

I, D. Craig Hughes, counsel for Michael J. McGowan, hereby certify that according to the word-count tool in WordPerfect, the Petition for Writ of *Certiorari*, consists of 5,530 words, including footnotes. The Petition therefore complies with Rule 33.1(g).

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

Executed on July 14, 2020.

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