

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

---

IN THE  
SUPREME COURT OF THE UNITED STATES

---

NATHANIEL RUTH,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

---

**CERTIFICATE OF WORD COUNT**

---

Pursuant to 28 U.S.C. § 1746, I hereby certify that the Petition for a Writ of Certiorari contains 5,095 words, including footnotes, as counted by Microsoft Word.

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

Executed on October 5, 2020

s/ Johanes Maliza

Johanes C. Maliza