

NO. 21-7270

IN THE SUPREME COURT OF THE UNITED STATES

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KARO BROWN,  
Petitioner,  
v.

UNITED STATES OF AMERICA,  
Respondent,

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

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**CERTIFICATE OF COMPLIANCE WITH  
WORD-COUNT LIMITATIONS**

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the petition for writ of certiorari contains 1,965 words, excluding the parts of the reply 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 May 18, 2022

*/s/ Molly K. Corbett*  
Molly K. Corbett