

No. _____

IN THE
Supreme Court of the United States

BRIAN FOLKS,
Petitioner,

vs.

UNITED STATES,
Respondent.

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

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I, Michelle Anderson Barth, certify that the Petitioner's Writ for Certiorari was prepared Century School Book 12 point type-face and contains 5,690 words, excluding the parts of the document that are exempted. This certificate was prepared in reliance on the word count function of the word processing system used to prepare the document.

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

Executed on March 14, 2022



Michelle Anderson Barth

Declarant