

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

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IN THE  
**Supreme Court of the United States**

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ARTHUR L. GURBEY  
*Petitioner,*

vs.

UNITED STATES,  
*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 WORD COUNT**

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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 3,492 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 June 20, 2022

M Bar

Michelle Anderson Barth

Declarant