

No. 22-\_\_\_\_

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

JON LAWRENCE FRANK,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

ON PETITION FOR A WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I, Patrick L. Bryant, a member of the bar of this Court, certify on this 7th day of June 2023, that the Petition for a Writ of Certiorari in the above-captioned case contains 8,586 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Patrick L. Bryant  
Patrick L. Bryant