

No. 22-__

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