No. 22-163

In The Supreme Court of the United States

LENAIR MOSES, Petitioner,

v.

UNITED STATES, Respondent,

On Petition for 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 certify that Brief of the Cato Institute as *Amici Curiae* Supporting Petitioner contains 5,306 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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September 19, 2022