

No. _____

IN THE SUPREME COURT OF THE UNITED STATES

KENNETH R. SPIRITO,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

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

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the Petition for a Writ of Certiorari to the Fourth Circuit, which was prepared using Century Schoolbook 12-point typeface contains 5,650 words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word) used to prepare the document.

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

DATED September 26, 2022.

Respectfully submitted,

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