

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

**IN THE SUPREME COURT OF THE UNITED STATES**

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KENNETH R. SPIRITO,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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

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**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,

*/s/ Erin M. Harrigan*

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