

No.:

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*In the Supreme Court of the United  
States*

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**Alex Bugno**  
*Petitioner,*

v.

**The State of Ohio,**  
*Respondent.*

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On Petition for Writ of Certiorari to the Supreme Court of  
the State of Ohio

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**Certificate of Word Count Compliance**

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**Rhys B. Cartwright-Jones**  
*Counsel of Record*  
42 N. Phelps St.  
Youngstown, OH 44503-1130  
330-757-6609, tel.  
866-223-3897, fax  
rhys@cartwright-jones.com  
Counsel for Petitioner

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari referenced above contains 2522 words, 12 pages, excluding the pro-forma parts of the document that are exempted by Supreme Court Rule 33.1(d). I declare so to the best of my knowledge and information.

Respectfully Submitted,

**Rhys B. Cartwright-Jones**  
42 N. Phelps St.  
Youngstown, OH 44503-1130  
330-757-6609, tel.  
216-272-1938, cell.  
866-223-3897, fax  
rhys@cartwright-jones.com  
Counsel for Petitioner

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

Executed on the \_\_\_\_ day of \_\_\_\_, 2022.

Notary Public: \_\_\_\_\_