

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

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IN THE  
SUPREME COURT OF THE UNITED STATES

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PHILIP M. CLOSE,  
*Petitioner*

v.

UNITED STATES OF AMERICA,  
*Respondent*

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CERTIFICATE OF WORD COUNT

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I certify that the petition for a writ of certiorari filed on February 21, 2023, complies with the requirements of Rule 33(1)(g)(i) and 33(2)(b) of the Rules of the Supreme Court. The petition consists of 21 pages and 3,173 words, not counting those portions of the petition excluded in Rule 34.

Dated: Rochester, New York  
February 21, 2023

Respectfully submitted,

Marianne Mariano  
Federal Public Defender, W.D.N.Y.

/s/Jay Ovsiovitch  
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