

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

PHILIP M. CLOSE,
Petitioner

v.

UNITED STATES OF AMERICA,
Respondent

CERTIFICATE OF WORD COUNT

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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