

UNITED STATES SUPREME COURT  
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ROBERT LEMKE, No. 22-\_\_\_\_\_

Petitioner,

v.

CERTIFICATE OF COMPLIANCE

UNITED STATES OF AMERICA,

Respondent.

\_\_\_\_\_X

As required by Supreme Court Rule 33.1(h), I hereby certify that the foregoing  
Petition for a Writ of Certiorari contains 4,359 words and was printed in 12-point  
Courier typeface in Microsoft Word format.

Dated: New York, NY  
April 17, 2023

\_\_\_\_\_/s/\_\_\_\_\_

BRENDAN WHITE