Case No.:

SUPREME COURT OF THE UNITED STATES

CERTIFICATE OF COMPLIANCE

DETECTIVE, #314 FRANK NAPOLITANO and FRANCIS JOSEPH MCGEOUGH

Petitioners,

v.

LAURENCE WASHINGTON,

Respondent.

As Required by Supreme Court Rule 33.1(g)(h), I certify that the PETITION FOR A WRIT OF CERTIORARI contains 8,642 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Dated: July 25, 2022

whinkel

Sworn to on this 25th day of July, 2022