

NO:\_\_\_\_\_

IN THE SUPREME COURT OF THE UNITED STATES  
OCTOBER TERM 2023

PETER FRATUS,

*Petitioner,*

v.

UNITED STATES OF AMERICA

*Respondent.*

**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

\_\_\_\_\_

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Petition for a Writ of Certiorari of Peter Fratus contains less than 9,000 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed July 10, 2023.

\_\_\_\_\_/S/ Joseph Schultz\_\_\_\_\_  
Joseph Schultz, Esq.