

No. 22-747

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**In the Supreme Court of the United States**

TRACY PENNINGTON,

*Petitioner,*

*v.*

STATE OF WEST VIRGINIA,

*Respondent.*

*On Petition for a Writ of Certiorari to the  
Supreme Court of Appeals of West Virginia*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 3,634 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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