



CERTIFICATE OF COMPLIANCE

No. 22-99

ANDREW T. BARRETT,

Petitioner,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Petitioner's Reply Brief in Support of Petition for Writ of Certiorari contains 2,999 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

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

Executed on November 29, 2022.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: November 29, 2022

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023