



## CERTIFICATE OF COMPLIANCE

No.

MICHAEL LIEBERMAN,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for a Writ of Certiorari contains 4,100 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on June 17, 2020.

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

Date: June 17, 2020  
John S. Buley

Notary Public

[seal]

