



**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  
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(800) 890-5001

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

Date: JUNE 17, 2020  
John B. Sulzberger

Notary Public

[seal]



JOHN B. SULZBERGER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023