

No. 20-_____

In the Supreme Court of the United States

BRETT LILLEMOE,
Petitioner,

v.

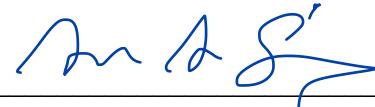
UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari for Brett Lillemoe as Petitioner contains 8,978 words, excluding the parts of the document 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 August 6, 2020.



ALEXANDRA A.E. SHAPIRO
SHAPIRO ARATO BACH LLP
500 Fifth Avenue
40th Floor
New York, NY 10110
(212) 257-4880
ashapiro@shapiroarato.com

*Counsel for Petitioner Brett
Lillemoe*