

No. \_\_\_\_\_

**IN THE SUPREME COURT OF THE UNITED STATES**

**MICHAEL P. O'DONNELL**

Petitioner - pro se,

v.

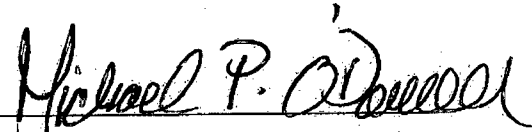
**UNITED STATES OF AMERICA**

Respondent.

**CERTIFICATE OF WORD COUNT**

Pursuant to Rule 33.1(h) of the Rules of this Court, I Michael P. O'Donnell certify that on August 20th 2020 the accompanying Petition for Writ of Certiorari which was personally prepared contains 8,137 words, excluding parts of the document that are exempt by Rule 33.1(d). This certificate was prepared in reliance on the word count function of the Microsoft Word Processing System.

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



Michael P. O'Donnell

Petitioner - pro se

