

NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 2020

Beau Brandon Croghan - Petitioner,

vs.

United States of America - Respondent.

CERTIFICATE

I, Brad Hansen, appointed counsel of record for Petitioner Beau Brandon Croghan, hereby certify that Mr. Croghan's petition for writ of certiorari contains 2,607 words, according to the "Word Count" feature of Microsoft Word. Thus, the Petition for Writ of Certiorari complies with the word limitations in Supreme Court Rule 33.

RESPECTFULLY SUBMITTED,

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