

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

LISA BERSHAN,
Petitioner,

vs.

UNITED STATES OF AMERICA ,
Respondent,

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Certiorari contains 5681 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 March 24, 2021.

_____/s/_____
JEREMIAH DONOVAN