No. 22-1055

## IN THE Supreme Court of the United States

LEE ELBAZ, A/K/A LENA GREEN, Petitioner,

v.

UNITED STATES OF AMERICA, Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

## **CERTIFICATE OF COMPLIANCE**

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 13th day of September, 2023, that the Reply Brief for Petitioner contains 2,984 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.

September 13, 2023

JAME A. SANTOS GOODWIN PROCTER LLP 1900 N Street, NW Washington, DC 20036 *jsantos@goodwinlaw.com* (202) 346-4000

Counsel for Petitioner