

IN THE  
**Supreme Court of the United States**

—————  
TIMOTHY D. KOONS, KENNETH JAY PUTENSEN,  
RANDY FEAUTO, ESEQUIEL GUTIERREZ,  
AND JOSE MANUEL GARDEA,  
*Petitioners,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

—————  
ON WRIT OF CERTIORARI TO THE UNITED STATES  
COURT OF APPEALS FOR THE EIGHTH CIRCUIT

—————  
**BRIEF OF NATIONAL ASSOCIATION OF  
FEDERAL DEFENDERS AS AMICUS CURIAE  
IN SUPPORT OF PETITIONERS**

—————  
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,330 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.

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Executed on January 29, 2018.

  
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Christopher R. Dorsey  
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