

In the Supreme Court of the United States

HERMAN AVERY GUNDY,

Petitioner,

v.

UNITED STATES,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Donald M. Falk, counsel for *Amicus Curiae* National Association of Criminal Defense Lawyers and a member of the Bar of this Court, certify pursuant to Rule 33.1(g) of the Rules of this Court that the Brief of National Association of Criminal Defense Lawyers as *Amicus Curiae* In Support of Petitioner in the above-captioned case contains 3,174 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



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