No. 19-1414 In The Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner.

v.

JOSHUA JAMES COOLEY,

Respondent.

CERTIFICATE OF SERVICE

I, Zachary C. Schauf, hereby certify that I am a member of the Bar of this Court, and that I have this 15th day of January 2021, caused three copies of the Brief for The Cayuga Nation, The Cherokee Nation, The Mille Lacs Band of Ojibwe, The Tunica-Biloxi Tribe of Louisiana, and The California Tribal Police Chiefs Association as *Amici Curiae* in Support of Petitioner to be served via overnight mail and an electronic version of the document to be transmitted via the Court's electronic filing system to:

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/s/ Zachary C. Schauf Zachary C. Schauf