

CERTIFICATE OF SERVICE

No. 20-280

George Georgiou,

Petitioner,

v.

United States,

Respondent.

I, Jeffrey T. Green, do hereby certify that, on this fifth day of October, 2020, I caused a copy and an electronic copy of the Brief of the National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner in the foregoing case to be served by first class mail, postage prepaid, and by email, on the following parties:

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