

Supreme Court of the United States United States Courts of Appeals

CERTIFICATE OF COMPLIANCE

No. 21-1161

STEVEN AIELLO AND JOSEPH GERARDI,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for *Amici Curiae* Criminal Law Scholars in Support of Petitioners contains 5,997 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 25, 2022.

EM

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date:	marc	h 25, 2022	_
	John M.	Buch	
Notar	y Public	J.	

[seal]



JOHN D. GALLAGHER Notary Public, State of Ohio My Commission Expires February 14, 2023