



**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.

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Emily Mullins  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: March 25, 2022

John D. Gallagher  
Notary Public

[seal]



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