



## CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief for *Amici Curiae* Criminal Law Scholars in Support of Petitioners in 21-1161, *Steven Aiello and Joseph Gerardi v. United States of America*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day and e-mail service to the following parties listed below, this 25th day of March, 2022:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on March 25, 2022.



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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: March 25, 2022

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
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