## In The Supreme Court of the United States

Louis Ciminelli,

Petitioner,

v.
UNITED STATES OF AMERICA,

Respondent.

On Petition for a Writ of Certiorari To the United States Court of Appeals For the Second Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 18th day of February 2022, that the Petition for a Writ of Certiorari in the above-captioned case contains 8,991 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben Michael R. Dreeben