

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 6th day of June, 2022, that the Reply Brief for Petitioner in the above-captioned case contains 2,962 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben
Michael R. Dreeben
