

No. 21-1170

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IN THE  
**Supreme Court of the United States**

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LOUIS CIMINELLI,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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ON WRIT OF CERTIORARI TO THE  
UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 29th day of August 2022, that the Brief for Petitioner in the above-captioned case contains 12,987 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Michael R. Dreeben*

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Michael R. Dreeben