



**CERTIFICATE OF COMPLIANCE**

No. 21-1170

LOUIS CIMINELLI,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for *Amici Curiae* Law Professors in Support of Petitioner contains 6,172 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 September 6, 2022.

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

Date: September 6, 2022

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2025