

IN THE
Supreme Court of the United States

No. 21-1170

LOUIS CIMINELLI,
Petitioner,
v.
UNITED STATES,
Respondent.

**On Writ of Certiorari
to the United States Court of Appeals
for the Second Circuit**

CERTIFICATE OF COMPLIANCE

Pursuant to this Court's Rule 33.1(h), I hereby certify that the Brief of The National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner contains 2,167 words, excluding parts of the document that are exempted by 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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