## 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 SERVICE**

I hereby certify that on this 6th day of September 2022, I caused three copies of the Brief of The National Association of Criminal Defense Lawyers as *Amicus Curiae* in Support of Petitioner to be served on the following by Federal Express and email:

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I hereby certify that all parties required to be served have been served. I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 6, 2022.

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