

No. 23-825

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

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SALVATORE DELLIGATTI,  
*Petitioner,*

*v.*

UNITED STATES OF AMERICA,  
*Respondent.*

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ON PETITION FOR A 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, Alan Schoenfeld, a member of the bar of this Court, certify that the accompanying Brief of the National Association of Criminal Defense Lawyers as Amicus Curiae in Support of Petitioner contains 5,571 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 1, 2024.

*Alan Schoenfeld/RMD*

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