

No. 21-1170

---

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

---

LOUIS CIMINELLI,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

---

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

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 14th day of November 2022, that the Reply Brief for Petitioner in the above-captioned case contains 5,997 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

*/s/ Michael R. Dreeben*

---

Michael R. Dreeben