

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

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PAUL ERLINGER,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

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

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**BRIEF FOR AMICUS CURIAE  
THE NATIONAL ASSOCIATION OF  
CRIMINAL DEFENSE LAWYERS  
IN SUPPORT OF PETITIONER**

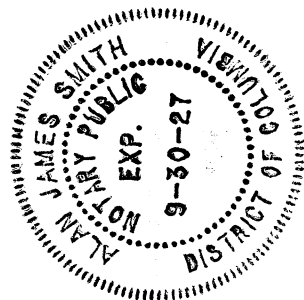
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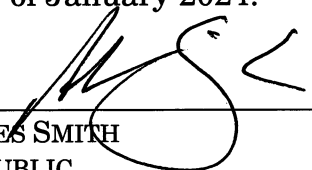
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,532 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sworn to and subscribed before me this 10th day of January 2024.



  
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ALAN JAMES SMITH  
NOTARY PUBLIC  
District of Columbia

My commission expires September 30, 2027.