

IN THE
Supreme Court of the United States

MARTIN MIZRAHI,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

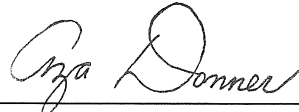
**BRIEF FOR *AMICI CURIAE* WASHINGTON
LEGAL FOUNDATION, DUE PROCESS
INSTITUTE, NATIONAL ASSOCIATION OF
CRIMINAL DEFENSE LAWYERS, AND
NATIONAL ASSOCIATION FOR PUBLIC
DEFENSE IN SUPPORT OF PETITIONER**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,297 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 1st day of June 2026.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.

