IN THE

## Supreme Court of the United States

SALVATORE DELLIGATTI,

Petitioner,

v.

UNITED STATES

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, Alan Schoenfeld, a member of the bar of this Court, certify that the accompanying Brief of the National Association of Criminal Defense Lawyers and FAMM as Amici Curiae in Support of Petitioner contains 5,911 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on August 15, 2024.

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