



CERTIFICATE OF COMPLIANCE

No. 20-828

FEDERAL BUREAU OF INVESTIGATION, ET AL,

*Petitioners,*

v.

YASSIR FAZAGA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Professor Barry Siegel as *Amicus Curiae* Supporting Respondents contains 7,990 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

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

Executed on September 28, 2021.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: September 28, 2021

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023