## No. 22-1178

## IN THE Supreme Court of the United States

FEDERAL BUREAU OF INVESTIGATION, ET AL.,

Petitioners,

v.

YONAS FIKRE,

Respondent.

## CERTIFICATE OF SERVICE

I hereby certify that I am a member in good standing of the bar of this Court and that on this 20th day of December, 2023, I caused three copies of the Brief of the Cato Institute as Amicus Curiae in Support of Respondent to be served by third-party commercial carrier on the counsel identified below, and caused an electronic version to be transmitted to the counsel identified below, pursuant to Rule 29.5 of the Rules of this Court. All parties required to be served have been served.

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**Russ Falconer**