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December 20, 2023

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 22-1178: FEDERAL BUREAU OF INVESTIGATION, ET AL. V. YONAS FIKRE

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Restore the Fourth, Inc. and the Forum for Constitutional Rights referenced above contains **2,948** 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.

Sincerely, Jack Suber, Esq. Principal



LISA KAY NICHOLSON Notary Public State of Maryland Montgomery County wy commission exp. October 12, 2026 Sworn and subscribed before me this 20th day of December 2023.

Pickolson