



CERTIFICATE OF COMPLIANCE

No. 22-179

UNITED STATES OF AMERICA,

Petitioner,

v.

HELAMAN HANSEN,

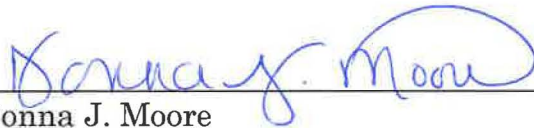
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Eugene Volokh in Support of Respondent contains 3,715 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

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

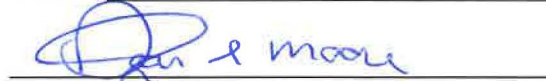
Executed on February 22, 2023.



Donna J. Moore
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(800) 890-5001

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

Date: 2-22-2023



Notary Public

[seal]



DOUGLAS S. MOORE
Notary Public, State of Ohio
My Commission Expires
December 18, 2027