

**CERTIFICATE OF COMPLIANCE**

No. 22-915

UNITED STATES OF AMERICA,

*Petitioner,*

v.

ZACKEY RAHIMI,

*Respondent.*

As required by Supreme Court Rule 33.1(g)(x), I certify that the AMICUS BRIEF OF THE NEW YORK COUNTY LAWYERS ASSOCIATION IN SUPPORT OF PETITIONER contains **5,994** words, excluding the parts of the brief 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 April 20, 2023.

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*s/Benjamin G. Shatz*  
Counsel of Record for *Amicus*  
The New York County Lawyers Association

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