

No. 22-915

In the Supreme Court of the
United States

UNITED STATES OF AMERICA,

Petitioner

v.

Zackey Rahimi,

Respondent

ON WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

CERTIFICATION OF WORD COUNT
PURSUANT TO RULE 33.1(h)

The BRIEF FOR AMICUS CURIAE NATIONAL AFRICAN AMERICAN GUN
ASSOCIATION, INC. IN SUPPORT OF RESPONDENT contains 7991 words and thus
complies with the word limitations set forth in Rule 33.1(g)(xii). This declaration is
made in compliance with 28 U.S.C. § 1746.

Date: October 2, 2023

/s/ Stephen P. Halbrook
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