

CERTIFICATE OF COMPLIANCE

No. 22-915

UNITED STATES,

Petitioner,

v.

ZACKEY RAHIMI,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Amicus Curiae Brief and Brief of Professor Lorianne Updike-Toler as Amicus Curiae In Support of Neither Party contains 331 and 6,074 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 November 2, 2023.

Donna J. Moore

Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102

Cincinnati, OH 45249

(800) 890-5001

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

Date:

. 2023

Notary Public

[seal]

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