



**CERTIFICATE OF COMPLIANCE**

No. 22-915

UNITED STATES,

*Petitioner,*

v.

ZACKEY RAHIMI,

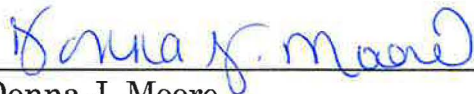
*Respondent.*

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: 11.2.2023  
  
\_\_\_\_\_  
Notary Public

[seal]



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