

No. 22-1178

IN THE SUPREME COURT OF THE UNITED STATES

SECURITIES AND EXCHANGE COMMISSION,

FEDERAL BUREAU OF INVESTIGATION, ET AL.,

Petitioners,

v.

YONAS FIKRE,

Respondent.

*On Writ of Certiorari to the
United States Courts of Appeals for the Ninth Circuit*

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Brief of the Liberty Justice Center contains 3,108 words, excluding the parts of the document 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 December 19, 2023

/s/ Jacob Huebert

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