



CERTIFICATE OF COMPLIANCE

No. 22-1178

FEDERAL BUREAU OF INVESTIGATION, ET AL.,

Petitioners,

v.

YONAS FIKRE,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* the Sikh Coalition and First Liberty Institute in Support of Respondent contains 3,047 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 December 20, 2023.

Julie A. Connor

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

Date: December 20, 2023

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028