

No. 22-915

**In the Supreme Court of the United States**

United States of America,  
*Petitioner,*

v.

Zackey Rahimi,  
*Respondent.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Brief of 97Percent as *Amicus Curiae* in Support of Petitioner contains 6,612 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 August 18, 2023.

           /s/ *Constance Van Kley*  
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