

No. 22-915

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In the Supreme Court of the United States

UNITED STATES OF AMERICA,  
*Petitioner,*

v.

ZACKEY RAHIMI,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE**

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Pursuant to Supreme Court Rule 33.1(h), I hereby certify that, according to the word-count tool in Microsoft Word, the Brief of Amicus Curiae Professor Mary Anne Franks in Support of Petitioner contains 7,552 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 21, 2023.

/s/ Douglas M. Poland  
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