

No. 22-915

IN THE
Supreme Court of the United States

UNITED STATES,

Petitioner,

v.

ZACKEY RAHIMI,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Andrew L. Schlafly, counsel for *Amici Curiae* Phyllis Schlafly Eagles and Eagle Forum Education & Legal Defense Fund, and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of *Amici Curiae* Phyllis Schlafly Eagles and Eagle Forum Education & Legal Defense Fund in Support of Respondent contains 4,313 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Andrew L. Schlafly

Andrew L. Schlafly
939 Old Chester Road
Far Hills, NJ 07931
(908) 719-8608
aschlafly@aol.com

Counsel for Amici Curiae

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