



**CERTIFICATE OF COMPLIANCE**

No. 22-915

UNITED STATES OF AMERICA,

*Petitioner,*

v.

ZACKEY RAHIMI,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Angus Kirk McClellan, PhD. in Support of Respondent contains 6,470 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 October 4, 2023.



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

Date: October 4, 2023

John D. Gallagher  
Notary Public

[seal]



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