



**CERTIFICATE OF COMPLIANCE**

No. 22-915

UNITED STATES,

*Petitioner,*

v.

ZACKEY RAHIMI,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Center for Human Liberty in Support of Respondent and Affirmance contains 7,960 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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Donna J. Moore  
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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