



## CERTIFICATE OF COMPLIANCE

No. 23-238

ROGER DALE ANDERSON,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for Petitioner contains 1,872 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 December 20, 2023.

Julie A. Connor  
Julie A. Connor  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

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

Date: December 20, 2023

John D. Gallagher  
Notary Public

[seal]



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