

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 23-

JOSEPH W. FISCHER,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Frederick W. Ulrich, certify that the petition for a writ of certiorari in the foregoing case contains 6,827 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 September 11, 2023.

*/s/ Frederick W. Ulrich*

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