

**CERTIFICATE OF SERVICE**

No. 23-5572

Joseph W. Fischer,  
Petitioner

v.

United States of America,  
Respondent.

I, Edward Lacy Tarpley, Jr., hereby certify that, on this twenty-ninth day of January 2024, I caused three copies and an electronic copy of the Amicus brief in the foregoing case to be served by Next Day Service and by email, on the following parties:

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