CERTIFICATE OF COMPLIANCE

No. 23-5572

Joseph W. Fischer,
Petitioner

V.

United States of America, Respondent.

As required by Supreme Court Rule 33.l(h), I certify that the Brief of Amici Curiae of FormerFedsGroup Freedom Foundation, and its Members, et. al. in Support of Petitioner contains 6,210 words of the allowed 6,500 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.l(d).

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