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February 5, 2024

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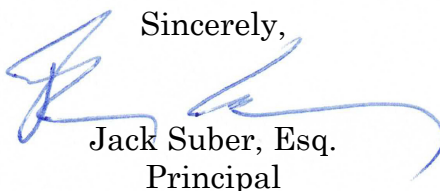
RE NO. 23-5572: JOSEPH W. FISCHER V. UNITED STATES OF AMERICA

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Liberty Counsel Action, Inc. referenced above contains **7,968** 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.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 5th day of February 2024.

