

No. 23-5572

**In The
Supreme Court of the United States**

JOSEPH W. FISCHER,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Writ of Certiorari to the United States
Court of Appeals for the District of Columbia Circuit

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of the American Center for Law and Justice in Support of Neither Party complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of the Amicus and all material following the last word of the text of the conclusion), contains 5,306 words.

February 5, 2024

/s/ Jay Alan Sekulow

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