SUPREME COURT OF THE UNITED STATES

No. 23-5572	X
JOSEPH W. FISCHER,	Α
	Petitioner,
v.	
UNITED STATES,	
	Respondent. X
CERTIFICATE OF WORD COUNT	

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,226 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 February 5, 2024

Noel Reyes

Sworn to and subscribed before me this 5^{th} day of February, 2024.

MARIANA BRAYLOVSKIY

Notary Public State of New York No. 01BR6004935 Qualified in Richmond County Commission Expires March 30, 2026

Mariana Braylovsby

#327286