IN THE Supreme Court of the United States

JOSEPH W. FISCHER,

Petitioner,
v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of U.S. Senator Tom Cotton, Representative Jim Jordan, and 21 Other Members of Congress as Amici Curiae in Support of Petitioner contains 6611 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed February 5, 2024

___/s/ R. Trent McCotter____ R. Trent McCotter Counsel of Record