



**CERTIFICATE OF COMPLIANCE**

No. 23-5572

JOSEPH W. FISCHER,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief Amicus Curiae of America's Future, Gun Owners of America, Gun Owners Fdn., Gun Owners of Cal., Citizens United, Citizens United Foundation, The Presidential Coalition, Tennessee Firearms Assn., U.S. Constitutional Rights Legal Def. Fund, and Conservative Legal Def. and Ed. Fund in Support of Petitioner contains 6,658 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

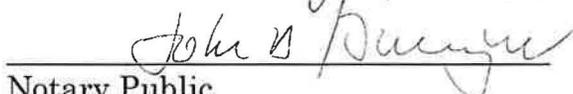
State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on February 5, 2024.

  
\_\_\_\_\_  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: February 5, 2024  
  
\_\_\_\_\_  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028