



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 of *Amici Curiae* Former Government Officials and Constitutional Lawyers in Support of Respondent contains 5,672 words, including the appendix and 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 March 6, 2024.

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

Date: March 6, 2024

John D. Gallagher
Notary Public

[seal]



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