

SUPREME COURT OF THE UNITED STATES

No. 23-5572

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JOSEPH W. FISCHER,

*Petitioners,*

*v.*

UNITED STATES,

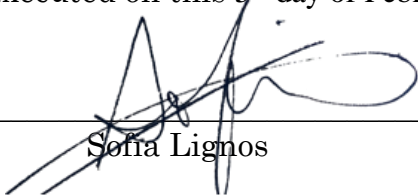
*Respondent.*  
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,405 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 this 5<sup>th</sup> day of February, 2024.

  
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Sofia Lignos

Sworn to and subscribed before me this 5<sup>th</sup> day of February, 2024.



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