IN THE SUPREME COURT OF THE UNITED STATES

No. 26-377

FRANK PARASMO,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the

United States Court of Appeals for the

Second Circuit

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae, Physicians Against Abuse, contains 5,156 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 November 4, 2026.

/s/ Michael Cohen

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