



CERTIFICATE OF COMPLIANCE

No. 19-635

DONALD J. TRUMP,

Petitioner,

v.

CYRUS R. VANCE, JR., in His Official Capacity as
District Attorney of the County of New York, *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Claire Finkelstein and Center for Ethics and the Rule of Law at the University of Pennsylvania as Amici Curiae Supporting Cyrus R. Vance, Respondent contains 7,245 words, excluding the parts of the Brief 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 March 4, 2020.

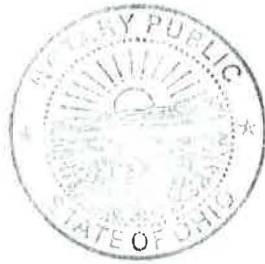
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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: March 4, 2020

Jean
Notary Public

[seal]



JULIE ANNE KERSHNER
Notary Public, State of Ohio
My Commission Expires
February 21, 2023