Nos. 19-715 & 19-760

IN THE SUPREME COURT OF THE UNITED STATES

DONALD J. TRUMP, et al.,

V.

MAZARS USA, LLP, et al.,

Respondents.

DONALD J. TRUMP, et al.,

V.

DEUTSCHE BANK AG, et al.,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Public Citizen in Support of Respondents contains 5,501 words, as calculated by the Microsoft Word word processing program and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on March 2, 2020.

Allison M. Zieve