IN THE

Supreme Court of the United States

DONALD J. TRUMP, ET AL.,

Petitioners,

v.

MAZARS USA, LLP, ET AL.,

Respondents.

DONALD J. TRUMP, ET AL.,

Petitioners,

v.

DEUTSCHE BANK AG, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondents contains 7,371 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 March 4, 2020.

Ashwin P. Phatak

Counsel for Amicus Curiae