

CERTIFICATE OF COMPLIANCE


No. 20-330

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, *Petitioner*,
v.
CITIZENS FOR RESPONSIBILITY & ETHICS IN WASHINGTON, ET AL., *Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Lawrence A. Hamermesh In Support Of Neither Party in the above-referenced cases contains 1,214 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 October 13, 2020



John C. Eastman
Counsel for *Amicus Curiae*
Professor Lawrence A. Hamermesh