No. 20-330

IN THE
SUPREME COURT OF THE UNITED STATES

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, PETITIONER

v.

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON, ET AL., RESPONDENTS

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Second Circuit

CERTIFICATE OF WORD COUNT COMPLIANCE

Robert W. Ray, a member of the Bar of this Court and an attorney for *amicus,* pursuant to Rule 33.1(h), hereby certifies that the Motion for Leave to File *Amicus Curiae* Brief and the *Amicus Curiae* Brief in support of the Petitioner, of Scholar Seth Barrett Tillman and the Judicial Education Project complies with the pertinent word limitations identified at Rule 33.1(g)(x). According to the word count of the word-processing system used to prepare the document, the motion contains 384 words and body of the brief, including footnotes (but exclusive of all material preceding the Interest of *Amicus* and all material following the last word of the text of the Conclusion), contains 5,457 words.

/s/ Robert W. Ray

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