



CERTIFICATE OF COMPLIANCE

No. 20-330

DONALD J. TRUMP, PRESIDENT
OF THE UNITED STATES,

Petitioner,

v.


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

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Respondents' Brief in Opposition contains 4,451 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 December 14, 2020.



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

Date: December 14, 2020

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023