



CERTIFICATE OF COMPLIANCE

No. 23-624

UNITED STATES,

Petitioner,

v.

DONALD J. TRUMP,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Former Attorney General Edwin Meese III and Law Professors Steven G. Calabresi and Gary S. Lawson as *Amici Curiae* Supporting Neither Party contains 5,992 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

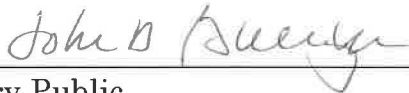
Executed on December 20, 2023.



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

Date: December 20, 2023



Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028