



**CERTIFICATE OF COMPLIANCE**

No. 23-719

DONALD J. TRUMP,

*Petitioner,*

v.

NORMA ANDERSON, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Professor Seth Barrett Tillman as *Amicus Curiae* in Support of Petitioner contains 7,960 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 January 9, 2024.

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

Date: 1-9-2024  
Donna J. Moore  
Notary Public

[seal]



**DOUGLAS S. MOORE**  
Notary Public, State of Ohio  
My Commission Expires  
December 18, 2027