



**CERTIFICATE OF COMPLIANCE**

No. 23-719

DONALD J. TRUMP,

*Petitioner,*

v.

NORMA ANDERSON, ET AL.,

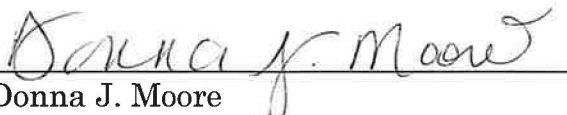
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Professor Kurt T. Lash as *Amicus Curiae* in Support of Petitioner contains 7,202 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 16, 2024.

  
\_\_\_\_\_  
Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
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(800) 890-5001

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

Date: 1-16-2024

  
\_\_\_\_\_  
Notary Public

[seal]



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