



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 *Amicus Curiae* of America's Future, Gun Owners of America, Inc., Gun Owners Foundation, Gun Owners of California, Inc., Heller Foundation, Tennessee Firearms Association, Tennessee Firearms Foundation, Inc., Public Advocate of the United States, U.S. Constitutional Rights Legal Defense Fund, Constitution Party National Committee, and Conservative Legal Defense and Education Fund in Support of Petitioner contains 7,975 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 18, 2024.

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

Date: January 18, 2024
John D. Gallagher
Notary Public

[seal]



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