



**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 on the Merits for Respondent Jena Griswold, Secretary of State of Colorado contains 11,738 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 31, 2024.

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

Date: January 31, 2024  
John D. Gallagher  
Notary Public

[seal]



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