

## 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 of Experts in Democracy as *Amici Curiae* in Support of Respondents contains 7,976 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.

Donna J. Moore Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249

(800) 890-5001

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

[seal]

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