

## 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 Amicus Curiae Professor Ilya Somin in Support of Respondent contains 6,583 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 J. Dunger

Notary Public

[seal]

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