



CERTIFICATE OF COMPLIANCE

No. 23A745

DONALD J. TRUMP,

*Applicant,*

v.

UNITED STATES,

As required by Supreme Court Rule 37.4, I certify that the Brief of Former Attorney General Edwin Meese III, Law Professors Steven Calabresi and Gary Lawson, and Citizens United as *Amici Curiae* in Support of Applicant contains less than 25 pages, 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 February 20, 2024.

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

Date: February 20, 2024  
John D. Gallagher  
Notary Public

[seal]



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