

No. 23-939

**In The
Supreme Court of the United States**

Donald J. Trump,
Petitioner,
v.

UNITED STATES OF AMERICA,
Respondent.

On Writ of Certiorari to the United States
Court of Appeals for the District of Columbia Circuit

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Amicus Curiae Brief of the American Center for Law and Justice in Support of Petitioner complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of the Amicus and all material following the last word of the text of the conclusion), contains 5,313 words.

March 19, 2024

/s/ Jay Alan Sekulow

Jay Alan Sekulow
Counsel of Record
201 Maryland Ave. NE
Washington, DC 20002
(202) 546-8890
sekulow@aclj.org

Counsel for Amicus ACLJ