

No. 23-939

In the Supreme Court of the United States

DONALD J. TRUMP,
Petitioner,

v.

UNITED STATES,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF PETITIONER PRESIDENT DONALD J. TRUMP contains 12,991 words, excluding those parts exempted by Supreme Court Rule 33.1(d).

Dated: March 19, 2024

/s/ D. John Sauer

D. John Sauer

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