



## CERTIFICATE OF COMPLIANCE

No. 23-939

DONALD J. TRUMP,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* America's Future, Judicial Action Group, Gun Owners of America, Gun Owners Fdn., Gun Owners of Calif., Tenn. Firearms Assoc., Tenn. Firearms Fdn., U.S. Constitutional Rights Legal Def. Fund, and Conservative Legal Def. and Ed. Fund in Support of Petitioner contains 7,957 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 March 19, 2024.

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

Date: March 19, 2024

John D. Gallagher  
Notary Public

[seal]



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