



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 for Former White House Chief of Staff Mark R. Meadows as *Amicus Curiae* in Support of Neither Party contains 2,133 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.

Donna J. Moore

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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