



**CERTIFICATE OF COMPLIANCE**

No. 23-939

DONALD J. TRUMP, *Petitioner*,

v.

UNITED STATES

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Former Attorneys General Edwin Meese III and Michael B. Mukasey; Law Professors Steven Calabresi and Gary Lawson; and Citizens United as *Amici Curiae* Supporting Petitioner contains 7,985 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