

No. 23-939

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IN THE  
Supreme Court of the United States

\_\_\_\_\_  
DONALD J. TRUMP,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

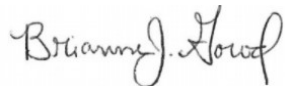
*Respondent.*

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**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**  
\_\_\_\_\_

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Scholars of Constitutional Law as *Amici Curiae* in Support of Respondent contains 6,504 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 8, 2024.



\_\_\_\_\_  
Brianna J. Gorod  
Counsel for *Amici Curiae*