



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 Amicus Curiae Citizens for Responsibility and Ethics in Washington in Support of Respondent contains 7,923 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 April 8, 2024.

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

Date: April 8, 2024
John D. Gallagher
Notary Public

[seal]



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