



## CERTIFICATE OF SERVICE

I, Donna J. Moore, hereby certify that 40 copies of the foregoing Brief of Amicus Curiae Citizens for Responsibility and Ethics in Washington in Support of Respondent in 23-939, *Donald J. Trump v. United States*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 8th day of April, 2024:

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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on April 8, 2024.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

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

[seal]



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