## No. 23-939

## IN THE SUPREME COURT OF THE UNITED STATES

DONALD J. TRUMP,

Petitioner,

v.

UNITED STATES,

Respondent.

## **CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen in Support of Respondents contains 5,802 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on April 5, 2024.

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