IN THE

## Supreme Court of the United States

DONALD J. TRUMP,

Petitioner,

v.

UNITED STATES,

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Seth P. Waxman, a member of the bar of this Court, certify that the accompanying Brief for Former Government Officials and Constitutional Lawyers as Amici Curiae in Support of Respondent contains 7,983 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on April 8, 2024.

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