CERTIFICATE OF COMPLIANCE

Case No. 23-939

Caption: Trump v. United States

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,287 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.

Samantha Collins Record Press, Inc.

Sworn to before me on

April 8, 2024

NADIA R. OSWALD HAMID Notary Public, State of New York No. 01OS6101366 Qualified in Kings County Commission Expires November 10, 2027

Notary Public