No. 23-939

IN THE SUPREME COURT OF THE UNITED STATES

DONALD J. TRUMP,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

WORD-COUNT CERTIFICATE

As required by this Court's Rule 33.1(h), I certify that the accompanying brief for amicus curiae contains 7920 words, as calculated by the word-processing software Word 16.83, excluding the parts of the document that are exempted by Rule 33.1(d).

Respectfully submitted,

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