

CERTIFICATE OF COMPLIANCE

No. 19-454

Donald J. Trump, President of the United States, et al.,

Petitioners

v.

Commonwealth of Pennsylvania, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Public Citizen contains 7921 words, excluding the parts of the brief 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, 2020.

/s/ Nandan M. Joshi