

**IN THE
SUPREME COURT OF THE UNITED STATES**

DONALD J. TRUMP, President of the United States,)	
Petitioner,)	No. 19-635
v.)	
CYRUS R. VANCE, JR., in his official capacity as District Attorney of the County of New York, <i>et al.</i> ,)	On Writ of <i>Certiorari</i> to the
Respondents.)	U.S. Court of Appeals for the
<hr/>		Second Circuit
DONALD J. TRUMP, <i>et al.</i> ,)	
Petitioners,)	Nos. 19-715, 19-760
v.)	
MAZARS USA, LLP, <i>et al.</i> ,)	On Writs of <i>Certiorari</i> to the
Respondents.)	U.S. Courts of Appeals for the
)	D.C. and Second Circuits
)	

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the “*Amicus Curiae* Brief of Eagle Forum Education & Legal Defense Fund in Support of Petitioners” in the above-captioned consolidated matters contains 4,298 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 February 3, 2020.

/s/ Lawrence J. Joseph
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