



**CERTIFICATE OF COMPLIANCE**

No. 23-719

DONALD J. TRUMP,

*Petitioner,*

v.

NORMA ANDERSON, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for U.S. Term Limits as *Amicus Curiae* in Support of Neither Party contains 3,678 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on January 18, 2024.

Donna J. Moore

Donna J. Moore  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: January 18, 2024

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028