



CERTIFICATE OF COMPLIANCE

No. 23-719

DONALD J. TRUMP,

Petitioner,

v.

NORMA ANDERSON, ET AL.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Former Attorneys General Edwin Meese III, Michael B. Mukasey, and William P. Barr; Law Professors Steven Calabresi and Gary Lawson; and Citizens United as *Amici Curiae* Supporting Petitioner contains 7,319 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.

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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