



**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 of *Amicus Curiae* Professor Kermit Roosevelt in Support of Respondents contains 6,479 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 30, 2024.

Donna J. Moore

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

Date: January 30, 2024

John D. Gallagher  
Notary Public

[seal]



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