

No. 23-719

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**In The Supreme Court of the United States**

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**DONALD J. TRUMP,**

*Petitioner,*

**v.**

**NORMA ANDERSON, *et al.*,**

*Respondents.*

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On Writ of Certiorari to the  
Colorado Supreme Court

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for respondent Colorado Republican State Central Committee, pursuant to Rule 33.1(h), hereby certifies that the Reply Brief of Respondent Colorado Republican State Central Committee in Support of Reversal complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Argument section and all material following the last word of the text of the conclusion), contains 5,018 words.

*/s/ Jay Alan Sekulow*\_\_\_\_\_

Jay Alan Sekulow

February 5, 2024