

No. 23-939

# In the Supreme Court of the United States

DONALD J. TRUMP,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the REPLY BRIEF OF PETITIONER PRESIDENT DONALD J. TRUMP contains 5,993 words, excluding those parts exempted by Supreme Court Rule 33.1(d).

Dated: April 15, 2024

/s/ D. John Sauer

D. John Sauer

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