

16-1466

MARK JANUS,

PETITIONER,

V.

AMERICAN FEDERATION OF STATE, COUNTY AND
MUNICIPAL EMPLOYEES, COUNCIL 31, ET. AL.,

RESPONDENTS,

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute, National Federation of Independent Business Small Business Legal Center, and Center of the American Experiment as Amici Curiae in Support of the Petition for Certiorari contains 8,496 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record