

## CERTIFICATE OF COMPLIANCE

Nos. 17-1717, 18-18

THE AMERICAN LEGION, et al.,

Petitioners,

V.

AMERICAN HUMANIST ASSOCIATION, et al.,

Respondents.

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION,

Petitioner,

V.

AMERICAN HUMANIST ASSOCIATION, et al.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Family Research Council as *Amicus Curiae* in Support of Petitioners contains 8,371 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 21, 2018.

Julie A Kershner

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

Date: December 21, 2018
Notary Public

[seal]

JOHN D. GALLAGHER Notary Public, State of Ohio My Conmission Expires February 14, 2023