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September 4, 2018

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE: No. 18-149: DOUG LAIR, ET AL. V. JEFF MANGAN, IN HIS OFFICIAL CAPACITY AS THE MONTANA COMMISSIONER OF POLITICAL PRACTICES, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Institute for Free Speech in Support of Petitioners referenced above contains **4,269** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.

Principal