

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amici Curiae* of Veterans in Defense of Liberty, *et al.* in *Maryland-National Capital Park and Planning Commission v. American Humanist Association, et al.*, No 18-18, in support of Petitioners, contains 1,414 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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