

CERTIFICATE OF COMPLIANCE

No. 18-944

TREE OF LIFE CHRISTIAN SCHOOLS,

Petitioner,

v.

CITY OF UPPER ARLINGTON, OHIO,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Citizens for Community Values in Support of the Petition for Writ of Certiorari contains 5,109 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 February 19, 2019.

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Donna J. Wolf Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001

Franklin Square 1300 | Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.

el Date: __ 2019 na Xn G. Notary Public [seal]

