



CERTIFICATE OF COMPLIANCE

No. 20-1800

HAROLD SHURTLEFF, *et al.*,

*Petitioners,*

v.

CITY OF BOSTON, MASSACHUSETTS, *et al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of The Rutherford Institute as *Amicus Curiae* in Support of Petitioners contains 4,888 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 November 22, 2021.

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

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

Date: November 22, 2021

John D. Gallagher  
Notary Public

[seal]



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