



**CERTIFICATE OF COMPLIANCE**

No. 22-238

CHARTER DAY SCHOOL, INC., ET AL.,

*Petitioners,*

v.

BONNIE PELTIER, AS GUARDIAN OF A. P., A MINOR  
CHILD, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* John Locke Foundation in Support of Petitioners contains 3,313 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 October 14, 2022.

Donna J. Wolf  
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: October 14, 2022

John D. Gallagher  
Notary Public

[seal]



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