



**CERTIFICATE OF COMPLIANCE**

Nos. 16-1466

MARK JANUS,

*Petitioner,*

v.

AMERICAN FEDERATION OF STATE, COUNTY  
AND MUNICIPAL EMPLOYEES, COUNCIL 31,  
*et al.,*

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* 1851 Center for Constitutional Law in Support of Petitioner contains 7,264 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 December 6, 2017.

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

Date: December 6, 2017

J.A. Kershner

Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2018