

IN THE  
**Supreme Court of the United States**

MARK JANUS,  
*Petitioner,*

v.

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

**On Writ of Certiorari to the United  
States Court of Appeals for the Seventh Circuit**

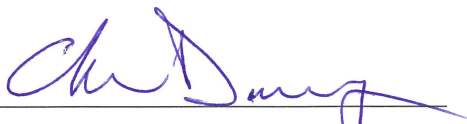
**BRIEF OF THE JAMES MADISON  
INSTITUTE AS AMICUS CURIAE  
IN SUPPORT OF PETITIONER**

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 8,523 words, excluding the parts of the document 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.



Christopher R. Dorsey  
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