

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

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MARK JANUS,

*Petitioner,*

v.

AMERICAN FEDERATION OF STATE, COUNTY, AND  
MUNICIPAL EMPLOYEES, COUNCIL 31, ET AL.,

*Respondents.*

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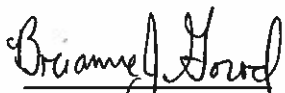
**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of Republican Current and Former State and Local Officeholders as *Amici Curiae* in Support of Respondents contains 6,639 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 January 19, 2018.



Brianne J. Gorod

Counsel for *Amici Curiae*