



## CERTIFICATE OF COMPLIANCE

Nos. 17-1717, 18-18

THE AMERICAN LEGION, *et al.*,

*Petitioners,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

*Respondents.*

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING  
COMMISSION,

*Petitioner,*

v.

AMERICAN HUMANIST ASSOCIATION, *et al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Justice and Freedom Fund as *Amicus Curiae* in Support of Petitioners contains 5,991 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 19, 2018.

*Julie A. Kershner*

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

Date: December 19, 2018

*John D. Gallagher*

Notary Public

[seal]



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