

No. 20-1088

---

---

In the Supreme Court of the United States

---

DAVID AND AMY CARSON, *et al.*

*Petitioners,*

v.

A. PENDER MAKIN.

---

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

---

**CERTIFICATE OF COMPLIANCE**

---

I hereby certify that the accompanying Brief of Protect the First Foundation as *Amicus Curiae* Supporting Petitioners in *Carson v. Makin*, No. 20-1088, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 4,562 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).



---

Gene C. Schaerr