



**CERTIFICATE OF COMPLIANCE**

No. 20-1088

DAVID CARSON, AS PARENT AND NEXT FRIEND OF O.C.,  
ET AL.,

*Petitioners,*

v.


A. PENDER MAKIN, IN HER OFFICIAL CAPACITY AS  
COMMISSIONER OF THE MAINE DEPARTMENT OF  
EDUCATION,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Petitioners contains 3,886 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 September 10, 2021.

  
\_\_\_\_\_  
Donna J. Wolf  
Becker Gallagher Legal Publishing, Inc.  
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Cincinnati, OH 45249  
(800) 890-5001

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

Date: September 10, 2021

John D. Gallagher

Notary Public

[seal]



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