

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of the National Legal Foundation, supporting Petitioners in No. 25-802, *Foothills Christian Ministries, et al. v. Kim Johnson, et al.*, contains 1,456 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 6, 2026

/s/ Frederick W. Claybrook, Jr.  
FREDERICK W. CLAYBROOK, JR.  
*Counsel of Record*  
CLAYBROOK LLC  
655 Fifteenth St., NW, Ste. 425  
Washington, D.C. 20005  
(301) 622-0360  
[rick@claybrooklaw.com](mailto:rick@claybrooklaw.com)