No. 18-107

In the Supreme Court of the United States

R.G. & G.R. HARRIS FUNERAL HOMES, INC.,
Petitioner,

v.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,
Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

BRIEF OF *AMICUS CURIAE* JEWISH COALITION FOR RELIGIOUS LIBERTY IN SUPPORT OF PETITIONERS

Howard Slugh
2400 Virginia Ave N.W.
Apt. C619
Washington, D.C. 20037
(954) 328-9461
Hslugh@JCRL.org

Parker Douglas
Counsel of Record
1109 C. Street, N.E.
Washington, D.C. 20002
(801) 699-7746
parkerdouglas66@gmail.com

Counsel for *Amicus Curiae*

QUESTIONS PRESENTED

1. Whether the word "sex" in Title VII's prohibition on discrimination "because of . . . sex," 42 U.S.C. 2000e-2(a)(1) meant "gender identity" and included "transgender status" when Congress enacted Title VII in 1964.

2. Whether *Price Waterhouse v. Hopkins*, 490 U.S. 228 (1989), prohibits employers from applying sex-specific policies according to their employees' sex rather than their gender identity.

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Other Authorities

INTEREST OF *AMICUS CURIAE*

Jews for Religious Liberty is a non-profit organization -- a group of lawyers, rabbis, and professionals who practice Judaism and defend religious liberty. *Amicus* members have each written on the role of religion in public life. Representing members of the legal profession, and as adherents of a minority religion, *amicus* has a unique interest in ensuring the flourishing of diverse religious viewpoints and practices. Jews for Religious Liberty advocates for people of faith who sincerely seek to exercise their religion not only in religious services but also in the way they live their faith in the public square. As detailed below, it is never appropriate for a court to determine that an adherent is wrong about his interpretation of his faith, so long as the adherent is sincere. But that is precisely what the Sixth Circuit did here, and this Court should correct that error. Taking that error as its primary focus, this brief additionally points to Jewish law regarding burial and funerals and argues that it would be unconstitutional under this Court's precedents if inferior courts were to second-guess -- as did the Sixth Circuit -- the validity of religious practices, particularly pertaining to rituals involving death and dying. *Amicus* has an interest in preserving that line. [1]

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[1] Consistent with this Court's Rule 37.6, *amicus curiae* states that this brief was not authored in whole or in part by counsel for any party, and no person or entity other than *amicus* and their counsel made a monetary contribution to the preparation or submission of this brief. In accordance with this Court's Rule 37.2, all parties were timely notified of the *amicus's* intent to file this brief, and correspondence consenting to the filing of this brief by all parties has been submitted to the Clerk.

SUMMARY OF ARGUMENT

Two hundred and thirty-three years ago James Madison denied that "the Civil Magistrate is a competent Judge of Religious Truth." See James Madison, *Memorial and Remonstrance Against Religious Assessments* (1785), reprinted in 8 *The Papers of James Madison* 295, 301 (Robert A. Rutland et al. eds., 1973). With his customary dry wit, Madison continued that the delusion that a judge ought engage in theological investigation "is an arrogant pretension falsified by the contradictory opinions of Rulers in all ages, and throughout the world[.]" *Id*. In this Madison was echoing his hero, John Locke, who over a century previous to Madison's declaration presaged: "The one only narrow way which leads to Heaven is not better known to the Magistrate than to private Persons, and therefore I cannot safely take him for my Guide, who may probably be as ignorant of the way as myself, and who certainly is less concerned for my Salvation than I myself am." John Locke, *A Letter Concerning Toleration* 37 (James H. Tully ed., 1983) (1689).

American constitutional jurisprudence agrees with Madison and Locke. Under what is colloquially known as the religious-question doctrine, this Court holds that as a constitutional matter our judiciary is prohibited from adjudicating issues of theology, doctrine, or belief. E.g., *Burwell v. Hobby Lobby Stores, Inc.*, 134 S. Ct. 2751, 2278-79 (2014). That is this brief's focus.

Petitioner correctly explains that the Sixth Circuit grossly departed from standard canons of statutory interpretation and joined a minority of other circuits to misinterpret Title VII. Pet. 13–30. The petition also rightly demonstrates that the Sixth Circuit intensifies

a circuit conflict in a manner that will exacerbate confusion over the state of the law and provide citizens with little guidance regarding how to conduct their intimate lives in a variety of circumstances. Pet. 30–36. This brief will not repeat those arguments.

This brief urges the Court to correct the Sixth Circuit's deviation from another judicial norm that is misapplied. That court also presumed to define religious orthodoxy for petitioner and then declare he did not run afoul of that judicially crafted "orthodoxy." Our Constitution prohibits the judiciary from such theologizing. This brief also details the likely harm to the faithful should this Court neglect to correct the Sixth Circuit's error. Such correction is sorely needed.

Millions of Americans belong to faith communities and conduct their affairs in reverence of their Creator. Our government has never felt it necessary to deny such citizens the ability to exercise their beliefs or to force them to be complicit in what they consider sin absent the most compelling of governmental needs. Yet that foundational principle of our pluralistic society is part of what is at stake in this case. The Sixth Circuit's decision not only presumes to tell the petitioner that it can define what is valid in his creed better than he can determine for himself, but it compounds that presumption by informing the petitioner that following their mandate is permitted by their newly-minted religion.

Madison and Locke were correct that the judiciary is not competent to determine such theological matters. They were also correct that such presumptions of judicial officers were a creature of arrogant pretention,

unlikely to offer clear guidance to citizens and protections to believers. Courts ought to be content with their role in the American legal system; they do not need to control the gates of Heaven as well. The Sixth Circuit ignored Madison's wisdom and this Court's precedent in taking a different tack. This Court should grant the petition to correct that error and the other identified errors.

ARGUMENT

Nearly two hundred and fifty years ago while moderating a proposal by George Mason, James Madison professed in the 1776 Virginia Declaration of Rights: "That Religion, or the duty which we owe the Creator, and the manner of discharging it, can be directed only by reason and conviction, not by force or violence; and, therefore, all men are equally entitled to free exercise of religion, according to the dictates of conscience[.]"[2] Two precepts in this provision remain foundational in constitutional law, as they informed the Bill of Rights: first, that individual conscience determines the quality of any "duty" owed in devotion; and, second, that government has no place in the determination of belief's character as creeds are "directed only by reason and conviction, not by force or violence."[3]

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[2] Virginia Declaration of Rights, ¶ 16, quoted in Michael W. McConnell, John H. Garvey & Thomas C. Berg, *Religion and the Constitution* 59 (2002).

[3] *Id.*, accord Michael W McConnell, *The Origins and Historical Understanding of the Free Exercise of Religion*, 103 Harv. L. Rev. 1409, 1443-44 (1990).

These two concepts have endured as bedrock principles of constitutional law – so much so that this Court finds them beyond debate. This past term in *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Comm'n,* this Court without pause observed that the government in general, and the judiciary in particular, has no authority or qualification to determine the validity of citizens' religious practices: "It hardly requires restating that government has no role in deciding or even suggesting whether the religious ground for [a citizen's] conscience-based objection is legitimate or illegitimate." 121 S.Ct. 1719, 1731 (2018).

This Court's precedent establishes that while a court may sometimes inquire into the sincerity of a religious adherent's beliefs, e.g. *United States v. Ballard*, 322 U.S. 78, 86 (1944), our judiciary has no business evaluating the ultimate validity or verity of any religious creed. E.g. *Thomas v. Review Bd. of Indiana Emp't Sec. Div.*, 450 U.S. 707, 714 (1981).

Eschewing these bedrock principles, the Sixth Circuit unconstitutionally determined the validity of petitioner's religious practices "as a matter of law." *EEOC v. Harris Funeral Homes, Inc.*, 884 F.3d 560, 588 (6th Cir. 2018). Analyzing his claims under the Religious Freedom Restoration Act (RFRA), the Sixth Circuit recognized petitioner's "honest conviction" that permitting and facilitating his biologically male employee to dress as a female would cause petitioner to "violate God's commands because it would make him directly involved in supporting the idea that sex is a changeable social construct rather than an immutable God-given gift[.]" *Id.* (internal quotation marks omitted). Nonetheless, the Sixth Circuit held "as a

matter of law" that "tolerating [petitioner's employee's] understanding of her sex and gender identity is not tantamount to supporting it." *Id*. Placing itself in the position of inquisitor, the Sixth Circuit held as a matter of law held that "a party can sincerely believe that he is being coerced into engaging in conduct that violates his religious convictions without actually, as a matter of law, being so engaged." *Id*.

Right there, the Sixth Circuit engaged in constitutionally impermissible conduct: it made itself the arbiter of orthodoxy concerning petitioner's religion. It decided as a matter of law the content of petitioner's religion and declared that as a matter of law the petitioner was not in conflict with that orthodoxy even though petitioner's unchallenged sincere belief told him that he was.

This Court should grant the petition for certiorari to correct this error and to send a clear message that it is not the province of our judiciary to determine what religious beliefs are legitimate or orthodox. Doing so would clearly reaffirm that our courts are neither competent nor equipped to determine what is genuine in religious belief and avoid the host of difficulties described below that following the Sixth Circuit's error would create. This brief describes the doctrine first and then details the harms the Sixth Circuit's ruling threatens to inflict on Jewish Americans. That ruling has the potential to make America a less tolerant and less welcoming home for religious minorities.

I. Federal Courts Have Neither the Authority nor the Qualifications to Determine the Validity of Religious Practices.

This Court has rejected the idea that the federal judiciary has any business speculating on the validity of a given religious belief. E.g., *Hobby Lobby*, 134 S. Ct. at 2778 ("[T]he federal courts have no business addressing whether the religious belief asserted in a RFRA case is reasonable.") (internal parentheses omitted); *Emp't Div., Dep't of Human Res. v. Smith*, 494 U.S. 872, 886-87 (1990) ("It is [not] appropriate for judges to determine the 'centrality' of religious beliefs … [or] the place of a particular belief in a religion or the plausibility of a religious claim."); *Thomas*, 450 U.S. at 716 ("[I]t is not within the judicial function and judicial competence to inquire whether the petitioner or his fellow worker more correctly perceived the commands of their common faith. Courts are not arbiters of scriptural interpretation."); *Ballard*, 322 U.S. at 86 (People "may believe what they cannot prove. They may not be put to the proof of their religious doctrines or beliefs."); see also *Watson v. Jones*, 80 U.S. (13 Wall.) 679, 728 (1871) ("In this country the full and free right to entertain any religious belief, to practice any religious principle, and to teach any religious doctrine which does not violate the laws of morality and property, and which does not infringe personal rights, is conceded to all. The law knows no heresy, and is committed to the support of no dogma, the establishment of no sect.").

Justice Alito has summed up the principle succinctly: "The argument that a plaintiff's own interpretation of his or her religion must yield to the government's interpretation is foreclosed by our

precedents. This Court has consistently refused to 'question the centrality of particular beliefs or practices to a faith, or the validity of particular litigants' interpretations of those creeds.'" *Ben-Levi v. Brown*, 136 S.Ct. 930, 934 (2016) (Alito, J., dissenting from denial of certiorari), quoting *Smith*, 494 U.S. at 887.

Two recent cases reaffirm this principle. In *Hobby Lobby*, the Court observed in exasperation: "This argument dodges the question that RFRA presents (whether the HHS mandate imposes a substantial burden on the ability of the parties to conduct business in accordance with their religious beliefs) and instead addresses a very different question that the federal courts have no business addressing (whether the religious belief asserted in a RFRA case is reasonable)." 134 S.Ct. at 2778.

In *Holt v. Hobbs*, the Court refused to consider various theological arguments attempting to justify why requiring a Muslim prisoner to shave his beard did not constitute a substantial burden on his religious exercise. 135 S. Ct. 853, 862–63 (2015). In *Holt*, the lower court had found that the prisoner's religious exercise was not substantially burdened by the prison's beard policy because, "his religion would 'credit' him for attempting to follow his religious beliefs," he exercised his religion in other manners, and other Muslim men were willing to shave. *Id*. This Court rejected this amateur theologizing, noting that the burden was substantial because "if petitioner contravenes that policy and grows his beard, he will face serious disciplinary action." *Id*. at 862. In other words, the Court accepted the petitioner's statement of

his faith and only considered the surrounding legal issues.

The Court's point is clear, as Madison and Locke warned: even well-intentioned judicial officers simply cannot be expected to understand the intricacies of religious practices. For instance, in *Ben-Levi* the lower court determined that a prison did not discriminate against a Jewish prisoner when it denied Jews, and only Jews, the right to engage in bible study. Like the Sixth Circuit here, the lower court in *Ben-Levi* exhibited the well-intentioned hubris that it was protecting "the purity of the doctrinal message and teaching." 136 S.Ct. at 934 (quoting district court decision). In his dissent from the denial of certiorari, Justice Alito noted that "Because NCDPS's policy rests on its understanding of Jewish doctrine, the policy does not apply to other religions. In fact, NCDPS intentionally treats different religions differently based on its perception of the importance of their various tenets." *Id*. at 931. Justice Alito further noted that: "In essence, respondent's argument—which was accepted by the courts below—is that Ben-Levi's religious exercise was not burdened because he misunderstands his own religion. If Ben-Levi truly understood Judaism, respondent implies, he would recognize that his proposed study group was not consistent with Jewish practice and that respondent's refusal to authorize the group 'was in line with the tenets of that faith.'" *Id*. at 933 (quoting district court decision). In fact, as a matter of Jewish law, there is absolutely no such requirement. The district court probably confused the obligation to have ten men for certain parts of a prayer service and communal Torah reading with a

nonexistent obligation to have ten men for bible study.[4] This mistake may be understandable and made in good-faith, but it highlights why the judiciary has no capacity to act as theologians and parse religious law.

The basis for the religious-question doctrine is made clear with this plain example, and the Sixth Circuit's decision rests on a gross error in the doctrine's breach. The Court should correct that error, as to refrain from so doing could facilitate and multiply the possible errors and harms next detailed.

II. Jews Have Religious Practices Related to Death and Burial and Courts Should Not Second Guess the Validity of These Practices.

For *Amicus*, the possibilities of judicial meddling in orthodoxy is real, and the facts of *Ben-Levi* are just a recent and prominent instance. But the example is not uncommon – a fact that weighs in favor of this Court granting the petition here, as cases of judicial incursions into determining orthodoxy are so common. For example, during a fairly recent oral argument, a judge on the Fifth Circuit chose turning "on a light switch every day" as a prime example of an activity that was unlikely to constitute a substantial burden on someone's religious exercise.[5] Yet to an Orthodox Jew,

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[4] Rabbi Abraham Millgram, *Minyan: The Congregational Quorum*, MYJEWISHLEARNING.COM, https://goo.gl/P4yigw (last visited Aug, 19, 2018) (discussing instances that require a quorum of 10 Jewish men, bible study is not included).

[5] Oral Argument at 1:00:00, *East Texas Baptist Univ. v. Burwell*, 2015 WL 3852811 (5th Cir. Apr. 7, 2015), available at goo.gl/L50Gt1 (last visited Aug. 15, 2018).

turning on a light bulb on the Sabbath could constitute a violation of a prohibition found in Exodus 35:3.

The possibility for judicially raising hob with orthodoxy is high because for Jews, as for many faith adherents, religion permeates the facets of everyday life. In fact, for Jews, the doctrine that one's faith should be fully integrated into the believer's daily life has deep roots. It is a central tenet of Judaism that throughout one's daily life one should accept and act upon the great multitude of opportunities to improve one's thoughts and behavior. Talmud, Makkos 23b; see also Rabbi Moshe Chaim Luzzato, Derech Ha-Shem §§ 1:2:1–5. These opportunities are "mitzvot," or commandments, constituting a complete set of civil and criminal laws that govern all aspects of Jewish life.

The mitzvot apply as equally to commercial transactions as to a believer's personal life:

- Because many Jews believe themselves prohibited from deriving any benefit from a cooked mixture of dairy and meat, a Jewish store owner cannot sell a cheeseburger to any customer, Jewish or Gentile, and would not be allowed to profit from allowing one of his employees to cook meat and dairy together. [6]

- Because of Sabbath day observances, a Jewish caterer would face many religious restrictions that would confine his ability to provide services

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[6] *Why Not Milk and Meat*, Aish.com, https://goo.gl/ymSYnr (last visited Aug. 15, 2018); Exodus 23:19, 34:26, Deuteronomy 14:21, and Babylonian Talmud: Hullin 113b, 115b.

to a formal wedding that occurred on the Sabbath or select holy day.[7]

- Many Jewish professionals would find it religiously transgressive to participate in a ceremony in which a Jew was converting to another religion. Leviticus 20:26; Exodus 20:2.

- Many religious Jews would be unable to engage in work that would enhance a polytheistic festival. Babylonian Talmud: Avodah Zarah 6a; Code of Jewish Law: Yoreh De'ah 148:1.

- The Tanakh prohibits Jews from wearing garments made from mixtures of wool and linen. Jews who follow this commandment would require an accommodation exempting them from wearing a prison, school, or military uniform made from a mixture of these materials. And many Jewish tailors would find it religiously objectionable to create such a garment for a Jewish customer.[8]

And with respect to the issues of this case, religious belief – where the judiciary has no place in determining legitimacy – permeate the activities of a funeral home. Rituals associated with death and dying merit the protections of RFRA and the judicial restraint embodied in the religious-question doctrine.

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[7] Menachem Posner, *What is Shabbat?*, Chabbad.org, https://goo.gl/83yxa6 (last visited Aug. 15, 2018); Exodus 16:26-30, 20:8-11, 23:12, 31:12-17, 34:21, 35:3, Leviticus 23:3, Deuteronomy 5:12-15, Isaiah 58:13-14, Amos 8:5, Haggai 1:8.

[8] S*hatnez-Free Clothing*, Chabad.org, goo.gl/RZRcSm (last visited Aug. 15, 2018); Leviticus 19:19; Deuteronomy 22:9-11.

Religious funeral homes work with rabbinic consultation to ensure that they comply with Jewish law that proscribes requirements – the details of some of which are described below. "Jewish law and tradition have endowed funeral and mourning practices with profound religious significance."[9] Religious Jewish funeral homes often seek rabbinic consultation to ensure that they comply with Jewish law.[10] This is necessary because Jewish law contains numerous and intricate requirements, including prohibitions related to death and burial. The requirements are complicated enough that even veteran funeral home owners "continue to seek rabbinic guidance" to ensure that they run their funeral homes "in conformance with Jewish Law."[11] According to experts involved in burial preparations, particularly difficult cases "such as death by accident or suicide, or death of children less than 30 days of age should be referred to the Rabbi for guidance."[12]

For example, under Jewish law and tradition:

- "as a mark of respect to the departed, the deceased is never left alone until after burial.

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[9] Chevra Kadisha of Greater Washington, A Basic Guide to Jewish Funeral Home Practice, https://goo.gl/CSmA5z (last visited Aug. 15, 2018).

[10] Torchinsk Hebrew Funeral Home; About our Funeral Home https://goo.gl/XevgZb (last visited Aug. 15, 2018) (noting that the owner of the funeral home worked with rabbis "to develop guidelines for a Jewish funeral home").

[11] *Id*.

[12] Chevra Kadisha of Greater Washington, A General Overview of Traditional Burial practices, http://www.chevrakadishagw.org/ (last visited Aug. 15, 2018).

Psalms are traditionally recited by the watcher";[13]

- embalming and viewing are avoided;[14]
- Jews are buried in a plain wood coffin without any "adornments or fancy features," and the coffin "has holes in it.";[15]
- bodies are buried on the day of death or as soon as possible thereafter;[16]
- cremation and autopsies are generally prohibited;[17]
- corpses are washed in a traditional manner of ritual purification known as "tahora";[18]
- the deceased is dressed in shrouds called "tachrichim" before burial.[19]

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[13] Chevra Kadisha of Greater Washington, A General Overview of Traditional Burial practices, http://www.chevrakadishagw.org/ (last visited Aug. 15, 2018).

[14] *Id*.

[15] Richard D. Aiken, From the Funeral Home to the Cemetery, OU.ORG, https://goo.gl/iQKWec (last visited Aug. 15, 2018).

[16] Id.; Deuteronomy 21:23; Rabbi Joesph Caro, Shulchan Aruch (Code of Jewish Law), Yoreh Deah at 357 (1563).

[17] Jewish Death and Mourning 101, MYJEWISHLEARNING.COM, https://goo.gl/7ACFk9 (last visited Aug. 15, 2018).

[18] *Id*.

[19] *Id*.; Rabbi Joesph Caro, Shulchan Aruch (Code of Jewish Law), Yoreh Deah at 351-52 (1563).

American courts cannot be expected to be aware of, let alone to understand the complexities of, these practices. If courts were to determine which Jewish burial practices merited protection "as a matter of law," they would risk inflicting additional suffering on already vulnerable citizens in mourning.

In sum, for millions of believers, "freedom to embrace religion as a way of life isn't an optional extra added on to practicing that way of life; freedom to embrace and hold onto religion *is a* constitutive component of a religion's way of life without which that very way of life is fundamentally compromised. For world religions, freedom of religion is a key substantive good." Miroslav Volf, *Flourishing: Why We Need Religion in a Globalized World* 113 (2015). And secular society benefits when it honors religious liberty and allows religious practices to flourish. See generally Angus J. L. Menuge, *The secular state's interest in religious liberty*, *in Religious Liberty and the Law: Theistic and Non-Theistic Perspectives*, 89 (Angus J. L. Menuge ed., 2017). For this reason, this Court should continue to be ever-vigilant when issues of breaching the religious-question doctrine present themselves, as they do in this case. The integrity of free exercise depends upon judicial restraint in determining religious orthodoxy.

The present case is no different, and indeed is a gross example of why and how the judiciary is ill-equipped and incompetent in matters of religious orthodoxy. It would cause tremendous suffering if a court were to decide that "as a matter of law" a funeral home misunderstood Judaism and could not aid a grieving family through the burial process in

compliance with Jewish law. The Sixth Circuit opinion below opens the door for exactly that scenario and therefore this Court should grant certiorari to again clarify that our judiciary has no business in determining the validity of religious practices.

CONCLUSION

This Court should grant the petition for certiorari.

Respectfully submitted,

Howard Slugh
2400 Virginia Ave N.W.
Apt. C619
Washington, D.C. 20037
(954) 328-9461
Hslugh@JCRL.org

Parker Douglas
Counsel of Record
1109 C. Street, N.E.
Washington, D.C. 20002
(801) 699-7746
parkerdouglas66@gmail.com

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Attorneys for *Amicus Curiae*

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CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amicus Curiae Jewish Coalition for Religious Liberty in case No. 18-107 contains 3,797 words, excluding 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 the 22d day of August 2018.

Howard Slugh
2400 Virginia Ave N.W.
Washington, D.C. 20037
(954) 328-9461
Hslugh@JCRL.org

Counsel for *Amicus Curiae*

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EQUAL OPPORTUNITY EMPLOYMENT COMMISSION,
Respondent.

AFFIDAVIT OF SERVICE

I HEREBY CERTIFY that all parties required to be served, have been served, on this 23rd day of August, 2018, in accordance with U.S. Supreme Court Rule 29.3, three (3) copies of the foregoing **BRIEF OF AMICUS CURIAE JEWISH COALITION FOR RELIGIOUS LIBERTY IN SUPPORT OF PETITIONERS** by placing said copies in the U.S. mail, first class postage prepaid, addressed as listed below.

James A. Campbell
Alliance Defending Alliance
15100 N. 90th Street
Scottsdale, AZ 85260
(480) 444-0020
jcampbell@ADFlegal.org

Noel J. Francisco
Solicitor General of the United States
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001
(202) 514-2217
SupremeCtBriefs@USDOJ.gov

KAREN PIERANGELI NOTARY PUBLIC DISTRICT OF COLUMBIA MY COMMISSION EXPIRES 06-14-2020

RAYMOND CHARLES CLARK
BYRON S. ADAMS, LEGAL & COMMERCIAL PRINTERS
1615 L Street, NW, Suite 100
Washington, DC 20036
(202) 347-8203

District of Columbia: SS
Subscribed and Sworn to before me this 23rd day of August, 2018.

KAREN PIERANGELI
NOTARY PUBLIC, DISTRICT OF COLUMBIA
My Commission Expires June 14, 2020.