



**CERTIFICATE OF COMPLIANCE**

No. 20-843

NEW YORK STATE RIFLE & PISTOL  
ASSOCIATION, INC., ET AL.,

*Petitioners,*

v.

KEVIN P. BRUEN, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Amicus Brief of the American Center for Law and Justice in Support of Petitioners and Urging Reversal contains 4,026 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 July 20, 2021.

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

Date: 7/20/21

[Signature]  
Notary Public

[seal]



AMY TRIPLETT MORGAN  
Attorney at Law  
Notary Public, State of Ohio  
My Commission Has No Expiration  
Date. Section 147.03 O.R.C.