



CERTIFICATE OF COMPLIANCE

No. 20-843

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

*Petitioners,*

v.

KEVIN P. BRUEN, IN HIS OFFICIAL CAPACITY AS  
ACTING SUPERINTENDENT OF NEW YORK STATE  
POLICE, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Gun Owners of America, Inc., Gun Owners Foundation, and Heller Foundation in Support of Petitioners contains 7,422 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: 7/20/27

[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.