In the Supreme Court of the United States

New York State Rifle & Pistol Association, $et\ al.$, Petitioners,

v.

The City of New York, et al., Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of *Amici Curiae* Western States Sheriffs' Association *et al.* in case No. 18-280 contains 5/77/ 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 8^{th} day of October, 2018.

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