

CERTIFICATE OF COMPLIANCE

No. 18-936

JEREMY KETTLER,

Petitioner,

V

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Downsize DC Foundation, DownsizeDC.org, Tennessee Firearms Association and The Heller Foundation in Support of Petitioner contains 2,849 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 February 19, 2019.

Donna J. Wolf

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

Date:

Notary Public

[seal]

JULIE ANNE KERSHNER Notary Public, State of Ohio My Commission Expires February 21, 2023