



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 of *Amicus Curiae* The Buckeye Institute in Support of Petitioners contains 4,218 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 19, 2021.

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

Date: 7/19/21

[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.