



**CERTIFICATE OF COMPLIANCE**

No. 21-1194

VIRGINIA DUNCAN; RICHARD LEWIS;  
PATRICK LOVETTE; DAVID MARGUGLIO;  
CHRISTOPHER WADDELL; CALIFORNIA RIFLE & PISTOL  
ASSOCIATION, INC., A CALIFORNIA CORPORATION,  
*Petitioners,*

v.

ROB BONTA, IN HIS OFFICIAL CAPACITY AS ATTORNEY  
GENERAL OF THE STATE OF CALIFORNIA,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* National Association for Gun Rights, Inc., in Support of Petitioners contains 2,706 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 March 30, 2022.

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

Date: March 30, 2022

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023