



CERTIFICATE OF COMPLIANCE

No. 21-1215

GUN OWNERS OF AMERICA, INC., ET AL.,

Petitioners,

v.

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae David Codrea, Scott Heuman and Owen Monroe in Support of Petitioners contains 3,919 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 April 6, 2022.

Donna J. Wolf
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: April 10, 2022

Heather Campbell

Notary Public

[seal]



HEATHER CAMPBELL
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date. Section 147.03 O.R.C.