

# **CERTIFICATE OF COMPLIANCE**

## No. 21-1215

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

Petitioners,

#### v.

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

Respondents.

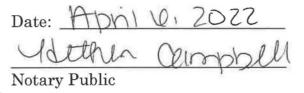
As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae David Codrea, Scott Heuman and Owen Monroe in Support of Petitioners contains 3,919 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

BECKER GALLAGHER LEGAL PUBLISHING INCORPORATED (800) 890.5001 www.beckergallagher.com 8790 Governor's Hill Drive Suite 102 Cincinnati, Ohio 45249 Franklin Square 1300 I Street, NW, Suite 400E Washington, DC 20005 Sworn to and subscribed before me by said Affiant on the date designated below.



[seal]

