

March 11, 20179

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

**RE 18-280: NEW YORK STATE RIFLE & PISTOL ASSOCIATION, *et al.*
v. THE CITY OF NEW YORK, *et al.***

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Judicial Watch, Inc. and Allied Educational Foundation as *Amici Curiae* in Support of Petitioners referenced above contains **1,761** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Arthur D. Chotin, Esq.
Principal