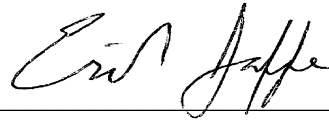


**CERTIFICATE OF COMPLIANCE**

I hereby certify that the accompanying BRIEF OF FIREARMS POLICY FOUNDATION, FIREARMS POLICY COALITION, AND THE CALGUNS FOUNDATION AS AMICI CURIAE IN SUPPORT OF PETITIONERS in New York State Rifle & Pistol Ass'n v. City of New York, No. 18-280, complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 5,276 words, based on the word-count function of Microsoft Word (Office 365), including footnotes and excluding material not required to be counted by Rule 33(d).

A handwritten signature in black ink, appearing to read "Erik S. Jaffe", is written above a horizontal line.

Erik S. Jaffe