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February 4, 2019

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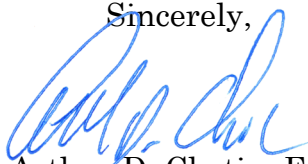
**RE: NO. 18-843: IVAN PENA, *ET AL.* V. MARTIN HORAN, DIRECTOR, CALIFORNIA  
DEPT. OF JUSTICE BUREAU OF FIREARMS**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Firearms Policy Coalition, Inc., Firearms Policy Foundation, Madison Society Foundation, Inc., San Diego County Gun Owners, California Association of Federal Firearms Licensees, Inc., and Commonwealth Second Amendment, Inc. in Support of Petitioners referenced above contains **5,989** 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