

18-843

IVAN PENA, ET AL.,  
*PETITIONERS,*

V.

MARTIN HORAN, DIRECTOR, CALIFORNIA DEPARTMENT OF JUSTICE  
BUREAU OF FIREARMS,  
*RESPONDENT.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief for the Cato Institute as *Amicus Curiae* in Support of Petitioners contains 2,475 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*