



CERTIFICATE OF COMPLIANCE

No. 20-157

EDWARD A. CANIGLIA,

Petitioner,

v.

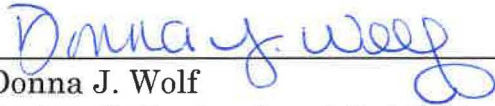
ROBERT F. STROM, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Gun Owners of America, Inc., Gun Owners Foundation, The Heller Foundation, and Conservative Legal Defense and Education Fund in Support of Petitioner contains 5,831 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 January 15, 2021.



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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: January 15, 2021

John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2023