

No. 20-18

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IN THE  
**Supreme Court of the United States**

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ARTHUR GREGORY LANGE, *Petitioner*,

v.

CALIFORNIA, *Respondent*.

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On Writ of Certiorari to the Court of Appeal of  
California, First Appellate District

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**CERTIFICATE OF COMPLIANCE**

IT IS HEREBY CERTIFIED, as required by Supreme Court Rule 33.1(h), that this Brief *Amicus Curiae* of Gun Owners of America, Inc., *et al.* in Support of Petitioner contains 3,162 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

*/s/ William J. Olson*

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