



CERTIFICATE OF COMPLIANCE

No. 20-843

NEW YORK STATE RIFLE & PISTOL
ASSOCIATION, INC., ET AL.,

Petitioners,

v.

KEVIN P. BRUEN, IN HIS OFFICIAL CAPACITY AS
ACTING SUPERINTENDENT OF NEW YORK STATE
POLICE, 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, and Heller Foundation in Support of Petitioners contains 7,422 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 July 20, 2021.

Emily Mullins
Becker Gallagher Legal Publishing, Inc.
8790 Governor's Hill Drive, Suite 102
Cincinnati, OH 45249
(800) 890-5001

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

Date: 7/20/27

[Signature]
Notary Public

[seal]



AMY TRIPLET MORGAN
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date, Section 147.03 O.R.C.