



CERTIFICATE OF COMPLIANCE

No. 21-1194

VIRGINIA DUNCAN, *ET AL.*,

Petitioners,

v.

ROB BONTA, ATTORNEY GENERAL OF CALIFORNIA,

Respondent.

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, Gun Owners of California, Heller Foundation, Virginia Citizens Defense League, Montana Shooting Sports Association, Oregon Firearms Federation, Tennessee Firearms Association, California Constitutional Rights Foundation, America's Future, Conservative Legal Defense and Education Fund, and Restoring Liberty Action Committee in Support of Petitioners contains 5,857 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 April 1, 2022.

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

Date: April 1, 2022

John D. Gallagher
Notary Public

[seal]



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