
In the Supreme Court of the United States

W. CLARK APOSHIAN, *Petitioner*


v.

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.

On Petition for Writ of Certiorari to the United
States Court of Appeals for the Tenth Circuit

CERTIFICATE OF WORD COUNT

I hereby certify that the accompanying brief of Damien Guedes, Shane Roden, Firearms Policy Foundation, Madison Society Foundation, Inc., and Florida Carry, Inc. as *Amici Curiae* Supporting Petitioner complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 2,800 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).



Erik S. Jaffe

September 3, 2021