



CERTIFICATE OF COMPLIANCE

No. 22-842

NATIONAL RIFLE ASSOCIATION OF AMERICA,

Petitioner,

v.

MARIA T. VULLO,

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, America's Future, Citizens United, Citizens United Foundation, Public Advocate of the United States, Leadership Institute, Free Speech Coalition, Free Speech Defense and Education Fund, DownsizeDC.org, Downsize DC Foundation, U.S. Constitutional Rights Legal Defense Fund, and Conservative Legal Defense and Education Fund in Support of Petitioner contains 5,868 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio
County of Hamilton

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

Executed on May 24, 2023.

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

Date: May 24, 2023
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2026