



CERTIFICATE OF COMPLIANCE

No. 22-976

MERRICK B. GARLAND, ATTORNEY GENERAL, ET AL.,
Petitioners,

v.

MICHAEL CARGILL,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the National Association for Gun Rights, Inc., the National Foundation for Gun Rights, Inc. and Rare Breed Triggers, LLC, as *Amici Curiae* in Support of Respondent contains 4,967 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 January 29, 2024.

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

Date: January 29, 2024
John D. Gallagher
Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, State of Ohio
My Commission Expires
February 14, 2028