

Nos. 22-842, 23-411

---

IN THE  
**Supreme Court of the United States**

---

THE NATIONAL RIFLE ASSOCIATION OF AMERICA,  
*Petitioner,*

v.

MARIA T. VULLO,  
*Respondent.*

---

VIVEK H. MURTHY, SURGEON GENERAL, ET AL.,  
*Petitioners,*

v.

MISSOURI, ET AL.,  
*Respondents.*

---

ON WRITS OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE SECOND AND FIFTH CIRCUITS

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, certify on this 22nd day of December, 2023, that the Brief of the International Municipal Lawyers Association as *Amicus Curiae* in Support of Neither Party in the above-captioned cases contain 4,619 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow  
Meaghan VerGow