No. 23-852

In the Supreme Court of the United States

Merrick B. Garland, Attorney General, et al.,

Petitioners,

v.

Jennifer VanDerStok, et al.,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amici Curiae Citizens Committee for the Right to Keep and Bear Arms, Western States Sheriffs' Association, Jews for the Preservation of Firearms Ownership, *et al.* in case No. 23-852 contains 6,921 words, excluding parts of the document 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 the twentieth day of August, 2024.

<u>/s/ Dan M. Peterson</u> DAN M. PETERSON DAN M. PETERSON PLLC 3925 CHAIN BRIDGE ROAD, STE. 403 FAIRFAX, VIRGINIA 22030 (703) 352-7276 dan@danpetersonlaw.com