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Raymond J. Lucia, et al., $PETITIONERS, \\ V.$ Securities and Exchange Commission, RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Cato Institute as Amicus Curiae in Support of Petitioners contains 4,482 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro Counsel of Record