

**CERTIFICATE OF COMPLIANCE**

No. \_\_\_\_\_

SOUTHERN TRUST METALS, INC., LORELEY OVERSEAS  
CORPORATION, and ROBERT ESCOBIO,

*Petitioners,*

v.

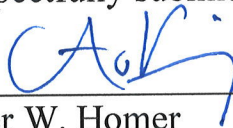
U.S. COMMODITY FUTURES TRADING COMMISSION,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,633 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

Executed on February 15, 2019.

Respectfully submitted:



---

Peter W. Homer

*Counsel of record*

Christopher J. King

**HOMER BONNER JACOBS**

1200 Four Seasons Tower

1441 Brickell Avenue

Miami, Florida 33131

(305) 350-5192

[phomer@homerbonner.com](mailto:phomer@homerbonner.com)

[cking@homerbonner.com](mailto:cking@homerbonner.com)

*Attorneys for Petitioners*