



CERTIFICATE OF COMPLIANCE

No. 18-1501

CHARLES C. LIU, *et al.*,

*Petitioners,*

v.

SECURITIES AND EXCHANGE COMMISSION,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Andy Altahawi as Amicus Curiae in Support of Petitioners contains 5,220 words, excluding the parts of the Brief 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 December 20, 2019.

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

Date: December 20, 2019

J.A.K.  
Notary Public

[seal]



JULIE ANNE KERSHNER  
Notary Public, State of Ohio  
My Commission Expires  
February 21, 2023