IN THE

Supreme Court of the United States

CHARLES C. LIU, ET AL.,

Petitioners,

v.

SECURITIES AND EXCHANGE COMMISSION,

Respondent.

CERTIFICATE OF SERVICE

I, Ashwin P. Phatak, do hereby declare that on January 22, 2020, as required by Supreme Court Rule 29.5, I have served by first-class mail, postage pre-paid, the Brief of Members of Congress as *Amici Curiae* in Support of Respondent on counsel for each party to the above proceeding as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 22, 2020.

Ashwin P. Phatak

Counsel for Amici Curiae