

No. 20-1727

In the
Supreme Court of the United States

JAMES DAVID O'BRIEN,

Petitioner,

VS.

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Respondent.

On Petition for Writ of Certiorari to
the United States Court of Appeals for the
Second Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the SUPPLEMENTAL BRIEF TO PETITION FOR WRIT OF CERTIORARI contains 1168 words, excluding the 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 July 8, 2021



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