

IN THE SUPREME COURT OF THE UNITED
STATES

No. 20-276

Christopher M. Gibson,

Petitioner,

v.

Securities and Exchange Commission,

Respondent.

Certificate of Compliance With
Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Atlantic Legal Foundation as *Amicus Curiae* in Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 3,411 words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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October 1, 2020