

No. 20-276

IN THE
Supreme Court of the United States

CHRISTOPHER M. GIBSON,

Petitioner,

v.

SECURITIES AND EXCHANGE COMMISSION, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of George R. Jarkey, Jr. as *Amicus Curiae* Supporting Petitioner contains 5,472 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: October 5, 2020



Mark A. Perry