



**CERTIFICATE OF COMPLIANCE**

No. 20-276

CHRISTOPHER M. GIBSON,

*Petitioner,*

v.

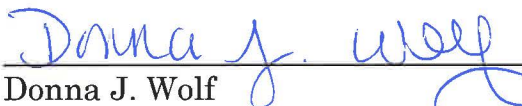
SECURITIES AND EXCHANGE COMMISSION, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Cato Institute, the Competitive Enterprise Institute, and the Chamber of Commerce of the United States of America as *Amici Curiae* in Support of Petitioner contains 4,227 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 October 5, 2020.

  
\_\_\_\_\_  
Donna J. Wolf  
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(800) 890-5001

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

Date: October 5, 2020

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023