No. 20-276

In the Supreme Court of the United States

CHRISTOPHER GIBSON,

Petitioner,

SECURITIES AND EXCHANGE COMMISSION, ET AL., Respondents.

v.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the MOTION

FOR LEAVE TO FILE AND BRIEF AMICUS CURIAE OF PACIFIC LEGAL

FOUNDATION IN SUPPORT OF PETITIONER contains 5,947 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 October 9, 2020.

OLIVER J. DUNFORD Counsel of Record Pacific Legal Foundation 4440 PGA Blvd., Ste. 307 Palm Beach Gardens, FL 33410 Telephone: (561) 691-5000 ODunford@pacificlegal.org

Counsel for Amicus Curiae Pacific Legal Foundation