

No. 21-1239

IN THE
Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION, ET AL.,
Petitioners,

v.

MICHELLE COCHRAN,
Respondent.

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 Raymond J. Lucia, Sr., George R. Jarkesy, Jr., and Christopher M. Gibson as *Amici Curiae* Supporting Respondent contains 4,460 words and complies with the word limitation established by this Court's Rule 33.1(g)(x).

Dated: April 11, 2022



Kellam M. Conover