

IN THE SUPREME COURT OF THE UNITED STATES

No. 21-1239

SECURITIES AND EXCHANGE COMMISSION, ET AL.,

Petitioners,

v.

MICHELLE COCHRAN,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,872 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).



John M. Masslon II

July 7, 2022