



CERTIFICATE OF COMPLIANCE

No. 21-1239

SECURITIES AND EXCHANGE COMMISSION, ET AL.,

Petitioners,

v.

MICHELLE COCHRAN,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Citizens United and Citizens United Foundation as *Amici Curiae* in Support of Respondent contains 7,167 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 July 7, 2022.

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

Date: July 7, 2022

Heather Campbell

Notary Public

[seal]



HEATHER CAMPBELL
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration
Date. Section 147.03 O.R.C.