



CERTIFICATE OF SERVICE

I, Emily Mullins, hereby certify that 1 unbound copy and 40 bound copies of the foregoing Brief of Citizens United and Citizens United Foundation as *Amici Curiae* in Support of Respondent in 21-1239, *Securities and Exchange Commission, et al. v. Michelle Cochran*, were sent via Next Day Service to the U.S. Supreme Court, and 3 copies were sent via Next Day Service and e-mail to the following parties listed below, this 7th day of July, 2022:

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All parties required to be served have been served.

I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on July 7, 2022.



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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: JULY 7, 2022

Heather Campbell
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[seal]



HEATHER CAMPBELL
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My Commission Has No Expiration
Date. Section 147.03 O.R.C.