

IN THE SUPREME COURT OF THE UNITED STATES

Securities & Exchange Commission, et al., *Petitioners*,

v.

Michelle Cochran, *Respondent*.

CERTIFICATE OF COMPLIANCE

In compliance with this Court's Rule 33.1(h), I hereby certify that the *Amicus Curiae* Brief of the Institute for Justice in the above-captioned case contains 5806 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Executed this 7th day of July, 2022.

/s/ Jared McClain

Counsel of Record