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 3,153 words and complies with the word limitation established by Rule 33.1(g)(xiv) of the Rules of this Court.

Dated: July 7, 2022

Kellam Conover