

In The
Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION, ET AL.,
Petitioners,

v.

MICHELLE COCHRAN,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amici Curiae* in Support of Respondent contains 2,499 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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