

CERTIFICATE OF COMPLIANCE  
No. 21-

In The  
**Supreme Court of the United States**

Donald J. Fowler,

*Petitioner,*

v.

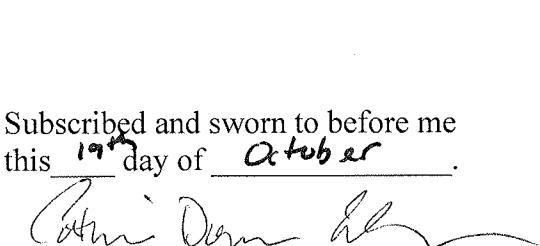
Securities and Exchange Commission,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR WRIT OF CERTIORARI contains 3,044 words, excluding the parts of the PETITION FOR WRIT OF CERTIORARI that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

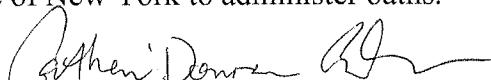
Executed on October 19, 2021.



Subscribed and sworn to before me  
this 19 day of October.



I am authorized under the laws of the  
State of New York to administer oaths.



CATHERINE DONOVAN CORDONE  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01CO6020607  
Qualified in Kings County LT NOV19  
Commission Expires March 1, 2023