

CERTIFICATE OF COMPLIANCE

No. 21-

In The
Supreme Court of the United States

Donald J. Fowler,

Petitioner,

v.

Securities and Exchange Commission,

Respondent.

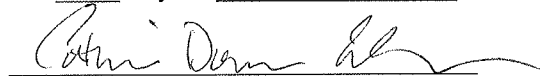
As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR WRIT OF CERTIORARI contains 3,044 words, excluding the parts of the PETITION FOR WRIT OF CERTIORARI that are exempted by Supreme Court Rule 33.1(d).

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

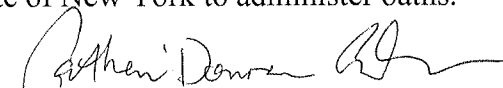
Executed on October 19, 2021.



Subscribed and sworn to before me
this 19th 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