

IN THE SUPREME COURT OF THE UNITED STATES

No. 22-859

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

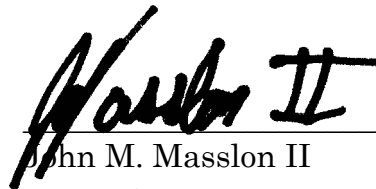
v.

GEORGE R. JARKESY, JR. AND PATRIOT28, L.L.C.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify under Supreme Court Rules 33.1(g) and (h) that Washington Legal Foundation's brief in this case contains 4,147 words, excluding those portions of the brief exempted by Supreme Court Rule 33.1(d).



John M. Masslon II

October 17, 2023