

No. 22-859

In The
Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

GEORGE R. JARKESY, JR., AND PATRIOT28 LLC,

Respondents.

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Robert E. Johnson, a member of the Bar of this Court, certify that the Brief for the Institute for Justice as Amicus Curiae Supporting Petitioner in the above-captioned case contains 7,998 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

October 18, 2023

/s/ Robert E. Johnson

ROBERT R. JOHNSON

Counsel of Record

INSTITUTE FOR JUSTICE

16781 Chagrin Blvd. #256

Shaker Heights, OH 44120

Tel. (703) 682-9320

rjohnson@ij.org