No. 22-859

Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

GEORGE R. JARKESY AND PATRIOTS28, L.L.C.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae of The Claremont Institute's Center for Constitutional Jurisprudence in support of Respondents contains 3,347 words, excluding the parts of the document 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 18, 2023.

ANTHONY T. CASO