IN THE

## Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

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

Respondents.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Matthew T. Martens, a member of the bar of this Court, certify that the accompanying Brief for David Julian as Amicus Curiae in Support of Respondents contains 7,996 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 18, 2023.

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