



**CERTIFICATE OF COMPLIANCE**

No. 22-859

SECURITIES AND EXCHANGE COMMISSION,

*Petitioner,*

v.

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

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Advancing American Freedom; Manhattan Institute; Americans for Limited Government Research Foundation; Center for Political Renewal; Citizens United; Citizens United Foundation; Committee for Justice; Faith and Freedom Coalition; Frontline Policy Council; International Conference of Evangelical Chaplain Endorsers; Tim Jones, Missouri Center-right Coalition; National Center for Public Policy Research; Nevada Policy Research Institute; New Jersey Family Foundation; North Carolina Institute for Constitutional Law; Rio Grande Foundation; Setting Things Right; and Tea Party Patriots Action, Inc. in Support of Respondents contains 6,606 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

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

Executed on October 18, 2023.

Donna J. Moore  
Donna J. Moore  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: October 18, 2023

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028