

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 17-1077

Francis V. Lorenzo,

Petitioner,

v.

Securities and Exchange Commission,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Kwaku A. Akowuah, certify that the Brief of *Amici Curiae* Securities Industry and Financial Markets Association and Chamber of Commerce of the United States of America Supporting Petitioner in the foregoing case contains 8,416 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 August 27, 2018.

/s/ Kwaku A. Akowuah
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