

IN THE
Supreme Court of the United States

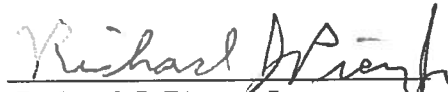
RAYMOND J. LUCIA, ET AL.,
PETITIONERS,

v.

SECURITIES & EXCHANGE COMMISSION,
RESPONDENT.

CERTIFICATE PURSUANT TO RULE 33.1(h)

I, Richard J. Pierce, Jr., counsel of record for 29 Administrative Law Scholars, do hereby certify, pursuant to Rule 33.1(h), that their brief amicus curiae contains 5055 words, including footnotes, excluding the portions set forth in Rule 33.1(d).


Richard J. Pierce, Jr.