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IN THE  
**Supreme Court of the United States**

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SECURITIES AND EXCHANGE COMMISSION

*Petitioner,*

v.

GEORGE R. JARKESY, JR., ET AL.,

*Respondents.*

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**On Writ of Certiorari to the  
United States Court of Appeals  
for the Fifth Circuit**

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**BRIEF OF *AMICUS CURIAE* ANDREW N.  
VOLLMER IN SUPPORT OF NEITHER PARTY**

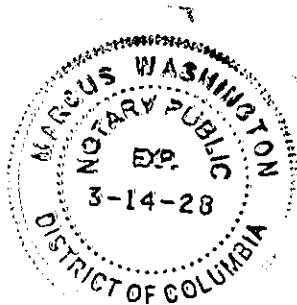
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 1,597 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.

Sworn to and subscribed before me this 20th day of July 2023.



A handwritten signature in black ink, appearing to be "M Washington", written over a horizontal line.

MARCUS WASHINGTON  
NOTARY PUBLIC  
District of Columbia

My commission expires March 14, 2028.