

No. 22-859

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**In The  
Supreme Court of the United States**

**SECURITIES AND EXCHANGE COMMISSION,**

*Petitioner,*

**v.**

**GEORGE R. JARKESY, JR., and PATRIOT28 LLC,**

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

I, Alan B. Morrison, counsel of record for the amici curiae Administrative Law Scholars, do hereby certify, pursuant to Rule 33.1(h) of this Court, that their brief contains 8160 words, including footnotes, excluding the portions set forth in Rule 33.1(d).



September 1, 2023

Alan B. Morrison