

No. 22-859

---

In The  
Supreme Court of the United States

---

SECURITIES AND EXCHANGE COMMISSION,

*Petitioner,*

v.

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

*Respondents.*

---

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 corrected brief contains 7989 words, including footnotes, excluding the portions set forth in Rule 33.1(d).



Alan B. Morrison

September 12, 2023