

IN THE SUPREME COURT OF THE UNITED STATES

No. 22-859

Securities and Exchange Commission,
Petitioner

v.

George R. Jarkesy, Jr. and Patriot28 LLC
Respondents

**Certificate of Compliance With
Word Limitation**

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation As *Amicus Curiae* In Support of Respondents complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **3,818** words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

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October 18, 2023