



**CERTIFICATE OF COMPLIANCE**

No. 22-859

SECURITIES AND EXCHANGE COMMISSION,

*Petitioner,*

v.

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

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Independent Women's Law Center as *Amicus Curiae* Supporting Respondents contains 3,536 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on October 18, 2023.



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Emily Mullins  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: October 18, 2023

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028