



CERTIFICATE OF COMPLIANCE

No. 22-859

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

GEORGE R. JARKESY, JR. AND PATRIOT28, L.L.C.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* the Chamber of Commerce of the United States, the National Federation of Independent Small Business Legal Center, Inc., and Business Roundtable in Support of Respondents contains 7,597 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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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