

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

I, Margaret Little, counsel for *amicus curiae* The New Civil Liberties Alliance (NCLA) and a member of the Bar of this Court, hereby certify pursuant to Supreme Court Rule 33(g) and (h) that this *amicus curiae* brief complies with the word limitations imposed by those rules. According to the word processing system used to prepare the brief, the word count for the brief is 7,594, not including the cover, table of contents, table of authorities, and signature block.

/s/ Margaret A. Little
Margaret A. Little
New Civil Liberties Alliance
1225 Nineteenth Street, NW, Suite 450
Washington, DC 20036
202-869-5210

Dated: October 18, 2023