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October 18, 2023

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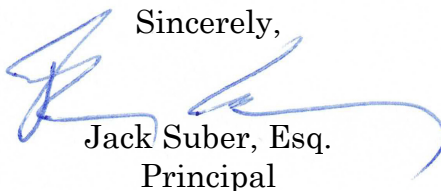
**RE NO. 22-859: SECURITIES AND EXCHANGE COMMISSION V. GEORGE R. JARKESY,
JR., ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* America First Policy Institute referenced above contains **2,922** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 18th day of October 2023.

