No. 26-514

In the Supreme Court of the United States

ERIC S. SMITH,

Petitioner,

v.

SECURITIES AND EXCHANGE COMMISSION, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of the Manhattan Institute as *Amicus Curiae* in Support of Petitioner contains 4,221 words and complies with the word limitation established by this Court's Rule 33.1(g)(x).

Dated: November 13, 2026

/s/ Benjamin W. Snyder
Benjamin W. Snyder