IN THE SUPREME COURT OF THE UNITED STATES

No. 26-514

ERIC S. SMITH,

Petitioner,

v.

SECURITIES AND EXCHANGE COMMISSION, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

I certify under Supreme Court Rule 33.1(g) and (h) that Amici Curiae's brief in this case contains 3,103 words, excluding the parts of the brief exempted by Supreme Court Rule 33.1(d).

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