

No. 25-1105

---

---

**In the Supreme Court of the United States**

FRANK THOMPSON

*Petitioner,*

*v.*

CARL WILSON, IN HIS OFFICIAL CAPACITY AS  
COMMISSIONER, MAINE DEPARTMENT OF  
MARINE RESOURCES,

*Respondent.*

*On Petition for Writ of Certiorari to the  
United States Court of Appeals for the First Circuit*

**CERTIFICATE OF COMPLIANCE  
WITH WORD LIMITATIONS**

As required by Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Petitioner contains 5,343 words, excluding the parts of the brief that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ilya Shapiro

Ilya Shapiro

*Counsel of Record*

April 21, 2026