## In the Supreme Court of the United States

Kenneth John Jouppi,

Petitioner,

v.

State of Alaska,

Respondent.

On Petition for a Writ of Certiorari to the Supreme Court of Alaska

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Professor Beth A. Colgan as Amicus Curiae in Support of Petitioner contains 5,593 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

October 17, 2025.

Respectfully submitted,

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