

In the
Supreme Court of the United States

KENNETH JOHN JOUPPI,
Petitioner,

v.

STATE OF ALASKA,
Respondent.

On Writ of Certiorari to the Supreme Court of Alaska

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Brief of American Free Enterprise Chamber of Commerce as *Amicus Curiae* contains 5,336 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed September 10, 2026

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