

No. 25-253

IN THE
Supreme Court of the United States

TURTLE MOUNTAIN BAND OF CHIPPEWA INDIANS, ET AL.,
Petitioners,

v.

MICHAEL HOWE, IN HIS OFFICIAL CAPACITY AS
SECRETARY OF STATE OF NORTH DAKOTA,
Respondent.

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 *Amicus Curiae* American Jewish Committee in Support of Petitioners contains 4,357 words and complies with the word limitation established by Rule 33.1(g)(x) of the Rules of this Court.

Dated: October 2, 2025

/s/ Theane Evangelis

Theane Evangelis