

IN THE  
Supreme Court of the United States

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FRANCIS NIELSEN,

*Petitioner,*

v.

KEKAI WATANABE,

*Respondent.*

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**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Respondent contains 7,259 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 30, 2026.



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Brianne J. Gorod  
Counsel for *Amicus Curiae*