

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that this petition for a writ of certiorari complies with the word limitations of Rule 33.1(g). According to the word-processing system used to prepare this petition, which includes footnotes in the word count, the petition contains 8,989 words.

Signed, Gary Sebastian Brown III on  
this 23<sup>rd</sup> day of November 2025

Gary Sebastian Brown III

*Pro se*

IDEPST

12296 NW Barnes Rd. #476

Portland, OR

97229

(971) 219-0293

[garysebastianbrowniii@gmail.com](mailto:garysebastianbrowniii@gmail.com)