

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 23rd 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