

IN THE
Supreme Court of the United States

GEORGE ANIBOWEI,

Petitioner,

v.

TODD BLANCHE, ATTORNEY GENERAL, ET AL.,

Respondents.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioner contains 5,817 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 18, 2026.

/s/ Brian R. Frazelle

Brian R. Frazelle

Counsel for *Amicus Curiae*