CERTIFICATE OF COMPLIANCE

No. _____

In The
Supreme Court of the United States

JAY FOLSE,
Petitioner,

v.

JOHN McCUSKEY, JR., ET AL.,
Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 5,752 words, excluding the parts of the petition 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 October 23, 2026.

/s/ Jay Folse
Jay Folse
Petitioner Pro Se