No. 18-1109

In the Supreme Court of the United States

James Erin McKinney

Petitioner,

v.

State of Arizona, *Respondent*.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that this Amicus Brief in Support of Petitioner contains 2,598 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 August 28, 2019.

/s/John R. Mills
John R. Mills
PHILLIPS BLACK, INC.
1721 Broadway, Suite 201
Oakland, CA 94612
(888) 532-0897
j.mills@phillipsblack.org
Counsel for Amicus