No. 21-371

IN THE Supreme Court of the United States

STATE OF OKLAHOMA,

Petitioner,

v.

JEFFERY ARCH JONES,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amicus Curiae Muscogee (Creek) Nation in Support of Respondent contains 5,993 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 November 4, 2021.

<u>/s/ Riyaz A. Kanji</u> Counsel of Record Kanji & Katzen, P.L.L.C. 303 Detroit Street, Suite 400 Ann Arbor, MI 48104 (734) 769-5400 rkanji@kanjikatzen.com