## In the Supreme Court of the United States

No. 22-899

JASON SMITH,

Petitioner,

v

STATE OF ARIZONA,

Respondent.

On Writ of Certiorari to the Court of Appeals of the State of Arizona, Division One

## CERTIFICATE OF WORD COUNT RE: BRIEF FOR THE PETITIONER

I HEREBY CERTIFY, pursuant to Supreme Court Rule 33.1(h), that the foregoing BRIEF FOR THE PETITIONER contains 12,445 words, as indicated by the word processing software used to prepare it, excluding the parts of the document that are exempted by the Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 13, 2023

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