

No. 22-899

IN THE
Supreme Court of the United States

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 COMPLIANCE WITH RULE 33.1

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National Association of Criminal Defense Lawyers, the American Civil Liberties Union, and the American Civil Liberties Union Foundation of Arizona as *Amici Curiae* in Support of Petitioner contains 3,576 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 20, 2023.



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