

No. 21-846

IN THE
Supreme Court of the United States

JOHN MONTENEGRO CRUZ,

Petitioner,

v.

STATE OF ARIZONA,

Respondent.

ON WRIT OF CERTIORARI TO THE
SUPREME COURT OF ARIZONA

CERTIFICATE OF SERVICE

As required by Supreme Court Rule 33.1(h), I, Noah A. Levine, a member of the bar of this Court, certify that the accompanying Brief of National Association of Criminal Defense Lawyers, American Civil Liberties Union, and American Civil Liberties Union of Arizona as Amici Curiae in Support of Petitioner contains 3,701 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on June 21, 2022.

Noah A. Levine/PLT

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