

No. 21-846

IN THE
Supreme Court of the United States

JOHN MONTENEGRO CRUZ,
Petitioner,


v.

STATE OF ARIZONA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of the Arizona Capital Representation Project and Arizona Attorneys for Criminal Justice as *Amici Curiae* in Support of Petitioner in *Cruz v. Arizona*, No. 21-846, complies with the word limitations, as it contains 7,104 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.


Elizabeth G. Bentley

Date: June 21, 2022