

June 21, 2022

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

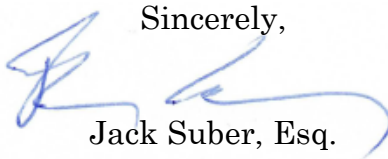
RE NO. 21-846: JOHN MONTENEGRO CRUZ V. STATE OF ARIZONA

Dear Sir or Madam:

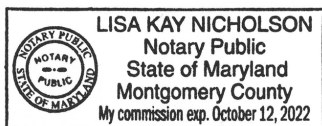
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Federal Courts Scholars referenced above contains **4,990** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d) but including the list of *Amici* in the Appendix.

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

Sincerely,



Jack Suber, Esq.
Principal



RUD ☐ BEUEERUBW ☐ DBI ☐ ☐

