

IN THE  
**Supreme Court of the United States**

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JOHN MONTENEGRO CRUZ,  
*Petitioner,*

v.

STATE OF ARIZONA,  
*Respondent.*

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**On Writ of Certiorari to the  
Arizona Supreme Court**

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**REPLY BRIEF FOR PETITIONER**

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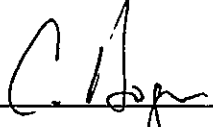
**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the brief contains 5,996 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.

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Executed on September 12, 2022.

  
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