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**By Electronic Filing and Hand Delivery**

Honorable Scott S. Harris  
Clerk of the Court  
Supreme Court of the United States  
Washington, D.C. 20543

**Re: *Bassett v. Arizona*, No. 23-830**

Dear Mr. Harris,

I am counsel of record for Petitioner in the above-captioned petition for certiorari. The Petition referenced pending cases that present the same question presented as the one in this case. *See* Pet. 11, 12 n.1, 13 n.2; Reply 7, 9-10. I respectfully submit this letter to inform the Court that the Arizona Supreme Court has now summarily denied review in four of these cases. *See State v. Petrone-Cabanas*, No. CR-23-0331-PR (Ariz. June 3, 2024), <https://perma.cc/NAQ5-FF28>; *State v. McLeod*, No. CR-23-0285-PR (Ariz. June 3, 2024), <https://perma.cc/D4MM-FSBJ>; *State v. Wagner*, No. CR-24-0013-PR (Ariz. June 3, 2024), <https://perma.cc/LQU5-HQA2>; *State v. Arias*, No. CR-24-0020-PR (Ariz. June 3, 2024), <https://perma.cc/F7ZS-GRQ5>. Altogether, the Arizona Supreme Court has now summarily denied five such petitions. *See* Reply 13 (citing *State v. Odom*, No. CR-23-0265-PR (Ariz. May 7, 2024), <https://perma.cc/Q3NJ-K7HL>).

These summary denials confirm that the decision below conclusively determined that juveniles who received mandatory life-without-parole sentences in Arizona will not be granted relief, in violation of this Court's decisions in *Miller v. Alabama*, 567 U.S. 460 (2012), *Montgomery v. Louisiana*, 577 U.S. 190 (2016), and *Jones v. Mississippi*, 593 U.S. 98 (2021).

Between 1997 and 2002, Felipe Petrone-Cabanas, Christopher Lee McLeod, Charles Vincent Wagner, and Jonathan Andrew Arias were sentenced as juveniles to

life without parole under a system in which the sentencer lacked “discretion to impose a lesser punishment.” *Jones*, 593 U.S. at 100; *see* Pet. 8. Three of these defendants faced the death penalty: One pled guilty in exchange for the State’s agreement not to pursue the death penalty, and in the other two, the sentencer imposed a life-without-parole sentence as an act of leniency. *See* Reply 9-10; *State v. Wagner*, 510 P.3d 1083, 1084 (Ariz. Ct. App. 2022), *vacated and remanded*, 2023 WL 9781388 (Ariz. Sept. 19, 2023); Pet. for Review, *State v. Arias*, No. CR-24-0020-PR, 2024 WL 1332638, at \*8 (Ariz. Feb. 20, 2024). Because Arizona abolished parole in 1994, the sentencing judges in each case were forbidden by state law from imposing a parole-eligible sentence.

Following this Court’s decision in *Montgomery*, the Court granted, vacated, and remanded the Arizona Court of Appeals’ decision denying relief to Mr. Arias. *See Arias v. Arizona*, 580 U.S. 951 (2016). The Arizona courts then examined whether Mr. Arias, Mr. Petrone-Cabanas, Mr. McLeod, and Mr. Wagner were entitled to relief pursuant to *Miller* and *Montgomery*. Although Arizona’s lower courts concluded that all four defendants were entitled to relief, Arizona appellate courts subsequently reversed those decisions citing the decision against Mr. Bassett that is before this Court on certiorari, and the Arizona Supreme Court has now summarily denied review. The Arizona Supreme Court’s denial of review confirms Arizona’s belief that “all juvenile lifers in Arizona are categorically not entitled to relief, without individualized consideration of each case.” Reply 10 (quoting NACDL Br. 15).

Respectfully submitted,

/s/ Neal Kumar Katyal  
Neal Kumar Katyal

*Counsel of Record for Petitioner*

cc: Alexander W. Samuels, Principal Deputy Solicitor General,  
Office of the Arizona Attorney General