## IN THE

## Supreme Court of the United States

JAMES KRAIG KAHLER,

Petitioner,

v.

KANSAS,

Respondent.

On Writ of Certiorari to the Kansas Supreme Court

PETITIONER'S REPLY BRIEF

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document 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.

Executed on August 30, 2019.

Colin Casey Hogan

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