

IN THE SUPREME COURT OF THE UNITED STATES

No. 19-1279

JAKE LATURNER, TREASURER OF THE STATE OF KANSAS,
Petitioner,

v.


UNITED STATES OF AMERICA AND ANDREA LEA, IN HER OFFICIAL CAPACITY
AS AUDITOR OF THE STATE OF ARKANSAS,
Respondents.

CERTIFICATE OF WORD COUNT

Pursuant to Rule 33.1(h) of the Rules of this Court, I certify that the accompanying Reply Brief for Petitioner, which was prepared using Century Schoolbook 12-point typeface, contains **2,962** words, excluding the parts of the document that are exempted by Rule 33.1(d). This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Office Word 2013) used to prepare the document.

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

Executed on August 5, 2020.



David C. Frederick
Counsel of Record for Petitioner