## IN THE

## Supreme Court of the United States

SAMUEL EDELMAN AND LOUISE EDELMAN,

Petitioners,

v.

NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE,  $et\ al.$ ,

Respondents.

On Petition for a Writ of Certiorari to the New York Supreme Court Appellate Division, First Department

BRIEF AMICUS CURIAE OF THE BUSINESS COUNCIL OF NEW YORK STATE, INC. IN SUPPORT OF PETITIONERS

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,441 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 July 24, 2019.

Colin Casey Hogan

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