



CERTIFICATE OF COMPLIANCE

No. \_\_\_\_

BOCILLA ISLAND SEAPORT, INC., formerly  
HIGHPOINT TOWER TECHNOLOGY, INC.,

*Petitioner,*

v.

COMMISSIONER OF THE INTERNAL REVENUE SERVICE,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 6,573 words, excluding the parts of the Petition 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 October 22, 2019.

Julie A. Kershner  
Becker Gallagher Legal Publishing, Inc.  
8790 Governor's Hill Drive, Suite 102  
Cincinnati, OH 45249  
(800) 890-5001

Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: October 22, 2019

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023