



## 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.  
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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