In the Supreme Court of the United States

CIC Services, LLC,

Petitioner,

V.

Internal Revenue Service,

Respondents.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

BRIEF OF AMICUS CURIAE PROFESSOR KRISTIN E. HICKMAN IN SUPPORT OF PETITIONERS

AFFIDAVIT OF SERVICE

Stephen M. West, states that all parties required to be served have been served and that three true and correct copies of the Brief of *Amicus Curiae* Professor Kristin E. Hickman in Support of Petitioners were served on the persons listed below on the 24th day of February, 2020, by depositing them with the United States Post Office, with First Class Postage prepaid.

Patrick Strawbridge CONSOVOY McCARTHY PLL Ten Post Office Square 8th Floor South, PMB #706 Boston, MA 02109

Noel J. Francisco Solicititor General United States Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530-0001

Stephen M. West

Subscribed and sworn to before me this 24th day of February, 2020.

Notary Public

KRISTI AUSTIN MOTCH

My Commission Expires Jan. 31, 2025