## In The

## Supreme Court of the United States

CIC Services, LLC,

Petitioner,

V.

Internal Revenue Service, Department of Treasury, United States of America,

Respondents.

ON 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

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

Executed on July 22, 2020.

Kristi Motch

Legal Brief Manager, Bachman Legal Printing

Subscribed and sworn to before me this 22nd day of July, 2020.

Notary Public