

CERTIFICATE OF COMPLIANCE

No. 20-1472

IN THE
Supreme Court of the United States

BOECHLER, P.C.,
Petitioner,

v.

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* National Taxpayers Union Foundation and National Federation of Independent Business Small Business Legal Center in Support of Petitioner in the above-entitled case contains 4,224 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henchman, declare under penalty of perjury that the foregoing is true and correct. Executed on November 22, 2021.



JOSEPH D. HENCHMAN

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