

CERTIFICATE OF COMPLIANCE

No. _____

JON D. ADAMS,

Petitioner

v.

COMMISSIONER OF INTERNAL REVENUE

Respondent

As required by Supreme Court Rule 33.1(h), I certify that the petition for a writ of certiorari contains 2,680 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 26, 2020.

/s/ James G. McGee, Jr.

James G. McGee, Jr.

COUNSEL FOR APPELLANT