No. 21-1052

In The Supreme Court of the United States

UNITED STATES OF AMERICA, EX REL. JESSE POLANSKY, M.D., M.P.H.,

Petitioner,

v.

EXECUTIVE HEALTH RESOURCES, INC., ET AL.

Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Amicus Curiae Brief of Taxpayers Against Fraud Education Fund complies with the type-volume limitations of Rule 33.1(g). Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains 5,419 words. (The undersigned is relying on the word-count utility in Microsoft Word, the word-processing system used to prepare the brief, consistent with Rule 33.1(d)).

Tejinder Singh September 2, 2022