No. 21-1397

IN THE

Supreme Court of the United States

IN RE GRAND JURY

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for the American College of Tax Counsel as *Amicus Curiae* in Support of Petitioner in *In re Grand Jury*, No. 21-1397, complies with the word limitations, as it contains 7,090 words.

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

Date: November 23, 2022

Hashim M. Mooppan