

No. 21-1599

In the Supreme Court of the United States

HANNA KARCHO POLSELLI, ABRAHAM & ROSE, P.L.C., AND JERRY R. ABRAHAM,
P.C.,

Petitioners,

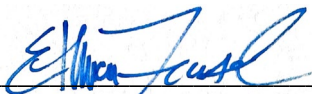
v.

UNITED STATES DEPARTMENT OF THE TREASURY –
INTERNAL REVENUE SERVICE,

Respondent.

CERTIFICATE OF COMPLIANCE

I, Ethan H. Townsend, counsel for amici The Rutherford Institute and The Cato Institute and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this amicus brief on behalf of petitioner contains 5,445 words, excluding the parts of the brief that are exempted by Rule 33.1(d).



Ethan H. Townsend