

No. 22-266

In the
Supreme Court of the United States

GARY S. CHRISTENSEN

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the **Brief of Tax Freedom Institute as *Amicus Curiae* in Support of Petitioner** contains 3,587 words, including footnotes, but excluding the parts exempted by Supreme Court Rule 33.1(d).

Executed on October 21, 2022.



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