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No. 22-800

CHARLES G. MOORE and KATHLEEN F. MOORE,
Petitioners,
v.
UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF AMICUS CURIAE TAX PROFESSORS DONALD B. TOBIN AND ELLEN P. APRILL IN SUPPORT OF RESPONDENT in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 7229 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 20th day of October, 2023. I am duly authorized under the laws of the State of Nebraska to administer oaths.

State of Nebraska – General Notary ANDREW COCKLE My Commission Expires April 9, 2026

Ondraw H. Colle

Affiant