

CERTIFICATE OF COMPLIANCE

No. 22-800

CHARLES G. MOORE, ET UX.,

Petitioners,

v.

UNITED STATES,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amici Curiae Tax Law Center at NYU Law and Professors Ari Glogower, David Kamin, Rebecca Kysar, and Darien Shanske in Support of Respondent contains 7,642 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio County of Hamilton

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

Executed on October 23, 2023.

Donna J. Moore

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: ____

Notary Public

[seal]

JOHN D. GALLAGHER Notary Public thate of Ohio My Commission Expires February 14, 2028