

CERTIFICATE OF COMPLIANCE

No. 23-125

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IN THE  
**Supreme Court of the United States**

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SEAVIEW TRADING, LLC, AGK INVESTMENTS, LLC,  
TAX MATTERS PARTNER,

*Petitioner,*

*v.*

COMMISSIONER OF INTERNAL REVENUE,

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*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case contains 3,239 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henchman, declare under penalty of perjury that the foregoing is true and correct. Executed on September 8, 2023.



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JOSEPH D. HENCHMAN

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