

### CERTIFICATION

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,716 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on May 29, 2024



Patrick A. Mullin

*Counsel of Record*

THE LAW OFFICES OF

PATRICK A. MULLIN

*Attorney for Petitioner*

45 Rockefeller Plaza

Suite 2000

New York, New York 10111

212-639-1600

mullin@taxdefense.com