

IN THE
Supreme Court of the United States

WILLIAM EDWARD POWELL,

Petitioner,

v.

JANET L. YELLEN, IN HER OFFICIAL CAPACITY AS SECRETARY OF THE UNITED STATES
DEPARTMENT OF TREASURY, UNITED STATES DEPARTMENT OF TREASURY, INTERNAL
REVENUE SERVICE, DANIEL I. WERFEL, IN HIS OFFICIAL CAPACITY AS COMMISSIONER
OF THE INTERNAL REVENUE SERVICE,


Respondents.

CERTIFICATE OF COMPLIANCE WITH RULE 33.1

As required by Supreme Court Rule 33.1(h), I certify that the **REPLY TO
BRIEF IN OPPOSITION** contains 2,848 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 November 21, 2024.



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