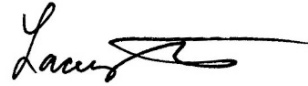


IN THE SUPREME COURT OF THE UNITED STATES

No. 20-1596

Taylor Lohmeyer Law Firm, PLLC,
Petitioner,
v.
United States of America,
Respondent.

I, Lacey Strachan, counsel for the American College of Tax Counsel as *Amicus Curiae*, hereby certify that, according to the word-count tool in Microsoft Word, the Brief of the American College of Tax Counsel as *Amicus Curiae* in Support of Petitioner consists of 3,401 words, including footnotes and excluding the sections enumerated by Rule 33.1(d). The Brief therefore complies with Rule 33.1(g).



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