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No. 20-645

STANDING AKIMBO, LLC, A COLORADO LIMITED  
LIABILITY COMPANY; PETER HERMES,  
AN INDIVIDUAL; KEVIN DESILET, AN INDIVIDUAL;  
SAMANTHA MURPHY, AN INDIVIDUAL; AND  
JOHN MURPHY, AN INDIVIDUAL,  
Petitioners,

v.

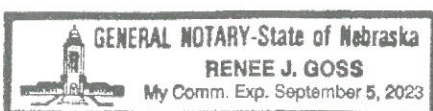
UNITED STATES OF AMERICA, THROUGH ITS  
AGENCY OF THE INTERNAL REVENUE SERVICE,  
Respondent.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the PETITION FOR REHEARING in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2869 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 21st day of July, 2021.

I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cockle*  
Affiant