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No. _____

In the Supreme Court of the United States

ROWLAND MARCUS ANDRADE, ET AL.,
Petitioner,

v.

INTERNAL REVENUE SERVICE,
Respondent.

CERTIFICATE OF COMPLIANCE

Pursuant to S. Ct. R. 33.1(h), I certify that the petition for writ of certiorari contains 8,256 words, excluding parts exempted by S. Ct. R. 33.1(d).

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

Executed on December 15, 2025

Huang Tiange
President
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