CERTIFICATE OF SERVICE No. 23-571

IN THE

Supreme Court of the United States

Madeline Pickens, v. v. United States, Respondent.

I, Joseph D. Henchman, do hereby certify that on December 19, 2023, three copies of the Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioner in the above-entitled case were mailed, first class postage prepaid to:

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