## In the Supreme Court of the United States

JAMES HARPER,

Petitioner,

v.

DOUGLAS O'DONNELL, IN HIS OFFICIAL CAPACITY AS ACTING COMMISSIONER OF THE INTERNAL REVENUE SERVICE; JOHN DOE IRS AGENTS 1–10,

Respondents.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the First Circuit

## **CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 4,467 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Thomas A. Berry
Counsel of Record
CATO INSTITUTE
1000 Mass. Ave., N.W.
Washington, DC 20001
(443) 254-6330
tberry@cato.org

March 28, 2025