

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CENTER FOR TAXPAYER RIGHTS, *et al.*,

Plaintiffs,

v.

INTERNAL REVENUE SERVICE, *et al.*,

Defendants.

Civil Action No. 1:25-cv-457-CKK

DEFENDANTS' NOTICE OF SUBMISSION OF ADMINISTRATIVE RECORD

Defendants respectfully submit the administrative record for this case. The administrative record is accompanied by a certification from an official from the Department of Treasury. An index of the record also accompanies Defendants' submission.

Plaintiffs have conditionally consented to Defendants' assertions of privilege to withhold certain information from the administrative record based on information provided by Defendants in conferral. Plaintiffs represent that their consent is a good faith attempt to avoid raising disputes to the Court, but the consent is conditional because Plaintiffs have not yet viewed the proposed redactions for privilege in the context in which they appear in the record.

Dated: October 29, 2025

Respectfully submitted,

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/s/ J. Stephen Tagert

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