## United States Court of Appeals

For the Eighth Circuit

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No. 13-2177
Henry J. Langer
Appellant
V.
Commissioner of Internal Revenue
Appellee
Appeal from the United States Tax Court
Submitted: November 29, 2013 Filed: December 3, 2013 [Unpublished]
Before MURPHY, SMITH, and SHEPHERD, Circuit Judges.
PER CURIAM.
Henry Langer appeals the tax court's adverse grant of summary judgment in
this collection action. Upon careful de novo review, see Cox v. Comm'r, 121 F.3d

<sup>&</sup>lt;sup>1</sup>The Honorable Lewis R. Carluzzo, United States Tax Court Judge.

390, 391 (8th Cir. 1997) (standard of review), we agree with the reasoning and conclusions of the tax court. Accordingly, we affirm. See 8th Cir. R. 47B.