

In the Supreme Court of the United States

No. _____

SEAVIEW TRADING, LLC, AGK INVESTMENTS, LLC,
TAX MATTERS PARTNER, PETITIONER.

v.

COMMISSIONER OF INTERNAL REVENUE,
RESPONDENT.

CERTIFICATE OF WORD COUNT

I, Lisa S. Blatt, counsel for petitioner and a member of the Bar of this Court, certify that the Petition for a Writ of Certiorari in the above-captioned case contains 6,075 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Lisa S. Blatt

LISA S. BLATT

August 7, 2023