

**SUPREME COURT OF THE UNITED STATES**

Case No. 25-49

-----X  
Alexander Sittenfeld aka P. G. Sittenfeld,

*Petitioner,*

*v.*

United States,

*Respondent.*

-----X

**CERTIFICATE OF WORD COUNT**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,438 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2025



\_\_\_\_\_  
Noel Reyes

Sworn to and subscribed before me this 14<sup>th</sup> day of August 2025.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026

CP# 131425