

**In the Supreme Court of the United States**

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ALEXANDER SITTENFELD, A/K/A "P.G."  
SITTENFELD,  
*Petitioner,*  
*v.*

UNITED STATES OF AMERICA,  
*Respondent.*

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

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**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Former Federal Public Corruption Prosecutors in Support of Petitioner contains 5774 words, excluding the parts of the brief exempted by Supreme Court Rule 33.1(d), and therefore complies with applicable word limitations. This certificate was prepared in reliance on the word-count function of the word-processing system (Microsoft Word Version 2502) used to prepare the document.

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

Executed on the 14th day of August 2025.

/s/ David A. O'Neil

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