

**CERTIFICATE OF COMPLIANCE**

No. 24-5438

MICHAEL BOWE,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Stephanie N. O'Banion, a member of the bar of this Court, certify that the accompanying Brief of Amicus Curiae Stephanie N. O'Banion contains 7,135 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 July 2, 2025

/s/ Stephanie N. O'Banion

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