

CERTIFICATE OF SERVICE

No. 24-5438

MICHAEL BOWE,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

I, Stephanie N. O'Banion, a member of the bar of this Court, hereby certify that, on this 2nd day of July, 2025, all parties required to be served have been served copies of the accompanying Brief of Amicus Curiae Stephanie N. O'Banion, as required by Supreme Court Rule 29.5(c), to the addresses on the attached service list.

/s/ Stephanie N. O'Banion

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