

**RULE 33.1(h) 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, Kwaku A. Akowuah, certify that the the Brief of Amici Curiae Habeas Scholars in Support of Petitioner in the foregoing case contains 5,273 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 April 14, 2025.

/s/ Kwaku A. Akowuah  
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