

IN THE
Supreme Court of the United States

MICHAEL BOWE,
Petitioner,

v.

UNITED STATES,
Respondent.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Gary M. Fox, a member of the bar of this Court, certify that the accompanying Brief for The National Association of Criminal Defense Lawyers as Amicus Curiae in Support of Petitioner contains 3,745 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on April 14, 2025.

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