

**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 Motion for Leave to File contains 816 words and the accompanying Brief of Amicus Curiae Stephanie N. O'Banion contains 7,022 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). The motion and accompanying brief are submitted in lieu of the Brief of Amicus Curiae Stephanie N. O'Banion submitted to the Court on July 2, 2025.

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

Executed on August 4, 2025

/s/ Stephanie N. O'Banion  
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