

No. 24-5438

IN THE SUPREME COURT OF THE UNITED STATES

MICHAEL BOWE, PETITIONER

v.

UNITED STATES OF AMERICA

CERTIFICATE OF SERVICE

It is hereby certified that all parties required to be served have been served with copies of the **REPLY BRIEF FOR THE UNITED STATES**, via e-mail and first-class mail, postage prepaid, this 22nd day of September, 2025.

[See Attached Service List]

As required by Supreme Court Rule 33.1(h), I certify that the document contain **3183** 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 **September 22, 2025.**

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September 22, 2025

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