

No. 25-5514

IN THE SUPREME COURT OF THE UNITED STATES

JOSEPH LEE BETANCOURT,  
Petitioner,

v.

UNITED STATES OF AMERICA,  
Respondent.

On Petition for Writ of Certiorari to the United States  
Court of Appeals for the Fifth Circuit

**CERTIFICATE OF SERVICE**

Evan G. Howze, appointed under the Criminal Justice Act, certifies pursuant to Rule 29.5 that he served the preceding Reply Brief for Petitioner on counsel for Respondent by: (1) mailing a copy (via first-class United States mail, postage prepaid) to Solicitor General D. John Sauer, Room 5614, Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, D.C., 20530; and (2) sending a copy via electronic mail to the Office of the Solicitor General, at [SupremeCtBriefs@USDOJ.gov](mailto:SupremeCtBriefs@USDOJ.gov). All parties required to be served have been served.

*s/ Evan G. Howze*

---

EVAN G. HOWZE  
Assistant Federal Public Defender  
*Counsel of Record*  
440 Louisiana, Suite 1350  
Houston, Texas 77002  
(713) 718-4600  
[evan\\_howze@fd.org](mailto:evan_howze@fd.org)