CERTIFICATE OF EMAIL TRANSMISSION TO COUNSEL FOR THE UNITED STATES

I certify that on October 23, 2026, I transmitted a true and correct copy of the foregoing Reply Brief for Petitioner in Bello v. United States, No. 26-5206, as a PDF attachment by email to counsel of record for the United States at:

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The foregoing certifies electronic transmission only. It does not certify paper service or filing with the Clerk of the Supreme Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 23, 2026.

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