

July 9, 2026

Clifton Cislak
Clerk of the Court
United States Court of Appeals for the District of Columbia Circuit
333 Constitution Ave NW
Washington, DC 20001

RE: *United States v. Navarro*, No. 24-3006 (D.C. Cir.) – Notice of Supplemental Authority

Dear Mr. Cislak,

Pursuant to Federal Rule of Appellate Procedure 28(j), Appellant Peter Navarro respectfully submits this letter to draw the Court’s attention to the Supreme Court’s recent order in *Bannon v. United States*, No. 25-453, 224 L. Ed. 2d 378 (April 6, 2026) (attached as Appendix A).

Mr. Bannon filed a petition for a writ of certiorari to the U.S. Supreme Court after this Court declined to rehear his case en banc. Pet. 1, *Bannon*, No. 25-453 (U.S. Oct. 10, 2025). Much of his petition concerned the interpretation of “willfully” in 2 U.S.C. § 192, *id.* at 13–29, which is also present in this case. In response, the United States notified the Court that it had filed a motion to dismiss the indictment in the district court. Br. for United States 3–4, *Bannon*, No. 25-453 (U.S. Feb. 9, 2026). Bannon supported the government’s motion in his reply, asking the Court to vacate the circuit court’s judgment and to remand to the district court for dismissal. Reply Br. 1–3, *Bannon*, No. 25-453 (U.S. Feb. 12, 2026). Accordingly, the Supreme Court granted certiorari, vacated the judgment, and ordered the case remanded to the district court.¹

¹ *Bannon*, 224 L. Ed. 2d at 378. This Court has not yet issued a mandate to the district court on that order.

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Appellant Navarro does not seek a similar resolution in his case. Instead, he continues to seek prompt resolution of this appeal on the merits.

Respectfully submitted,

/s/ Abhishek Kambli

Abhishek Kambli

Counsel for Peter Navarro