

No. 19-5617

In the Supreme Court of the United States

GARY RAY BOWLES,

Petitioner,

vs.

STATE OF FLORIDA,

Respondent.

SUPREME COURT RULE 33.1(h) CERTIFICATION

I certify that the *amicus curiae* brief in support of the petition for a writ of *certiorari* accompanying this certification complies with the word-count limits of Supreme Court Rule 33.1. The *amicus curiae* brief (including footnotes but not including the table of contents, the table of cited authorities and the list of counsel at the conclusion) includes 5,994 words as calculated by the word-counting feature of Microsoft Word.

I declare under penalty of perjury under the laws of the United States of America (28 U.S.C. § 1746) that the foregoing is true and correct.

August 16, 2019

/s/ April Boyer

April Boyer