IN THE

Supreme Court of the United States

MICHAEL BOWE,

Petitioner,

v.

UNITED STATES,

Respondent.

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

BRIEF OF THE UNIVERSITY OF VIRGINIA SCHOOL OF LAW'S CIVIL RIGHTS CLINIC AND THREE OTHER CIVIL RIGHTS ORGANIZATIONS AS AMICI CURIAE IN SUPPORT OF PETITIONER

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 4,613 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.

Sworn to and subscribed before me this 14th day of April 2025.

AZA SAZINDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.