

IN THE  
**Supreme Court of the United States**

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MICHAEL BOWE,  
*Petitioner,*  
v.  
UNITED STATES,  
*Respondent.*

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

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**BRIEF OF COURT APPOINTED AMICUS  
CURIAE IN SUPPORT OF JUDGMENT  
BELOW ON FIRST QUESTION PRESENTED**

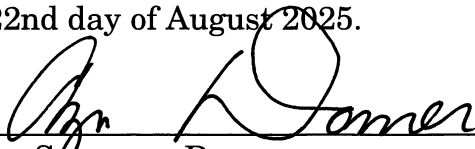
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 9,790 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 22nd day of August 2025.

  
\_\_\_\_\_  
AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.

