

No. \_\_\_\_\_

IN THE

**Supreme Court of the United States**

JONATHAN WELLS

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

**CERTIFICATE OF SERVICE**

I certify that on this 8th day of August 2022, in accordance with Sup. Ct. R. 29, copies of the (1) Petition for Writ of Certiorari, (2) Motion for Leave to Proceed *In Forma Pauperis*, and (3) Certificate of Service were served via the United States Postal Service Priority Mail for delivery within three days upon the Office of the Solicitor General of the United States of America, 950 Pennsylvania Ave., NW, Washington, D.C. 20530-0001. Electronic copies of these documents were also sent via electronic mail to [supremectbriefs@doj.gov](mailto:supremectbriefs@doj.gov).

Dated: August 8, 2022

---

Leah Spero  
*Counsel of Record*  
Spero Law Office  
255 Kansas Street, Suite 340  
San Francisco, CA 94103  
(415) 565-9600  
[leah@sperolegal.com](mailto:leah@sperolegal.com)