
NO. 23-7174

IN THE SUPREME COURT OF THE UNITED STATES

Richard Lee David Brown,

Petitioner,

-vs.-

United States of America,

Respondent.

PROOF OF SERVICE

I, Derek R. LaBrie, appointed pursuant to the Criminal Justice Act, hereby certify that on August 20, 2024, one (1) copy of the Reply Brief for the Petitioner, in the above-entitled case, was mailed by depositing it in a U.S. Postal Service Depository located in Des Moines, Iowa, first-class postage prepaid and addressed to counsel for the respondent:

Solicitor General of the United States
Room 5616, Department of Justice
950 Pennsylvania Ave., N. W.
Washington, DC 20530-0001

I, Derek R. LaBrie, appointed pursuant to the Criminal Justice Act, hereby certify that on August 20, 2024, eleven (11) copies of the Reply Brief for the Petitioner, in the above-entitled case, were mailed by depositing them in a U.S. Postal Service

Depository located in Des Moines, Iowa, first-class postage prepaid and addressed to
the Office of the Clerk of Court:

Office of the Clerk of Court
Supreme Court of the United States
1 First Street, N.E.
Washington, DC 20543-0001

I further certify that all parties required to be served have been served.

/s/ Derek R. LaBrie

Derek R. LaBrie

Counsel of Record

Zenor Law Firm, P.L.C.

111 East Grand Ave., Suite 400

Des Moines, Iowa 50309

Phone: (515) 650-9005

Fax: (515) 206-2654

derek@zenorlaw.com

ATTORNEY FOR PETITIONER