

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 24-1084

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STEVEN M. HOHN,

*Petitioner,*

*v.*

UNITED STATES,

*Respondent,*

-----X

STATE OF NEW YORK            )

COUNTY OF NEW YORK        )

I, Ann Tosel, being duly sworn according to law and being over the age of 18, upon my oath depose and say that:

I am retained by Counsel of Record for *Amici Curiae* Criminal Law Academics.

That on the 19<sup>th</sup> day of May, 2025, I served the within *Brief of Amici Curiae Criminal Law and Ethics Professors In Support of Petitioner* in the above-captioned matter upon:

Kannon K. Shanmugam  
Counsel of Record  
Paul, Weiss, Rifkind, Wharton &  
Garrison LLP  
2001 K Street, N.W.  
Washington, DC 20006  
202-223-7300  
kshanmugam@paulweiss.com

D. John Sauer  
Counsel of Record  
Solicitor General  
United States Department of  
Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
202-514-2217  
supremectbriefs@usdoj.gov

by sending three copies of same, addressed to each individual respectively, through FedEx Priority. An electronic version was also served by email to each individual.

That on the same date as above, I sent to this Court forty copies of the within *Brief of Amici Curiae Criminal Law and Ethics Professors In Support of Petitioner* through the Overnight Next Day Federal Express, postage prepaid. In addition, the brief has been submitted through the Court's electronic filing system.

All parties required to be served have been served.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 19<sup>th</sup> day of May, 2025.



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Ann Tosel

Sworn to and subscribed before me  
this 19<sup>th</sup> day of May, 2025.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2026

