IN THE

SUPREME COURT OF THE UNITED STATES Joel S. Elliott, Petitioner, v. United States of America, Respondent. On Petition for Writ of Certiorari to the

United States Court of Appeals for the Tenth Circuit

PROOF OF SERVICE

I hereby certify as follows:

I am an Assistant Federal Public Defender for the Districts of Colorado 1. and Wyoming, and I was appointed to represent the Petitioner, Joel S. Elliott, pursuant to the Criminal Justice Act of 1964, see 18 U.S.C. § 3006A.

2. On May 8, 2025, a copy of Petitioner's Reply to the United States' Brief in Opposition was sent via email and Federal Express for delivery to:

D. John Sauer, Solicitor General Solicitor General of the United States Room 5616 Department of Justice 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530-0001

Email: SupremeCtBriefs@usdoj.gov

3. All parties required to be served have been served.

/s/ John C. Arceci

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