

No. 22-6640
IN THE
Supreme Court of the United States

EUGENE JACKSON,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF SERVICE

I, Douglas E. Litvack, hereby certify that I am a member of the Bar of this Court, and that I have this 19th day of July 2023, caused three copies of the Brief of *Amicus Curiae* Clause 40 Foundation in Support of Petitioner Eugene Jackson to be served via overnight mail and an electronic version of this document to be transmitted via the Court's electronic filing system and email to:

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