

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-1086

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KEITH PHARMS,

*Petitioner,*

*v.*

UNITED STATES OF AMERICA,

*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 *Amicus Curiae* the Cato Institute.

That on the 17<sup>th</sup> day of April, 2026, I served the within *Brief of the Cato Institute as Amicus Curiae In Support of Petitioner* in the above-captioned matter upon:

John Patrick Elwood  
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*Attorney for Petitioner*

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*Attorney for Respondent*

by sending three copies of same, addressed to each individual respectively, through Priority Mail.

That on the same date as above, I sent to this Court forty copies of the within Amicus Curiae Brief through the Overnight Next Day Federal Express, postage prepaid.

That on the 17<sup>th</sup> day of April, 2026, an electronic version was served by email to each individual. 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 17<sup>th</sup> day of April, 2026.



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Ann Tosel

Sworn to and subscribed before me  
this 17<sup>th</sup> day of April, 2026.



**MARIANA BRAYLOVSKIY**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2030

