

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-668

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JEFFREY ANDREWS,

*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 *Petitioner*.

That on the 5<sup>th</sup> day of May, 2026, I served the within *Reply in Support of Petition for Writ of Certiorari* in the above-captioned matter upon:

**Counsel for Respondent United States of America:**

D. John Sauer  
Solicitor General of the United States  
United States Department of Justice  
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950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001  
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**Counsel for *Amici Curiae* States of West Virginia, Nebraska, and 21 Other States:**

Caleb Bennett David  
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Charleston, WV 25305  
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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 *Reply in Support of Petition for Writ of Certiorari* through the Overnight Next Day Federal Express, postage prepaid.

That on the 5<sup>th</sup> day of May, 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 5<sup>th</sup> day of May, 2026.



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Ann Tosel

Sworn to and subscribed before me  
this 5<sup>th</sup> day of May, 2026.



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

