

**AFFIDAVIT OF SERVICE**

SUPREME COURT OF THE UNITED STATES

No. 25-

-----X

ELIAS PHILIP FRANCIS,

*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 15<sup>th</sup> day of April, 2026, I served the within *Petition for Writ of Certiorari* and *Motion for Leave to Proceed In Forma Pauperis* in the above-captioned matter upon:

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

by sending one copy of same, addressed to each individual respectively, through Priority Mail.

That on the same date as above, I sent to this Court three copies of the within *Petition for Writ of Certiorari* and *Motion for Leave to Proceed In Forma Pauperis* through the United States Postal Service Priority Mail, postage prepaid.

That on the 15<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 15<sup>th</sup> day of April, 2026.

*Ann Tosel*

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Ann Tosel

Sworn to and subscribed before me  
this 15<sup>th</sup> day of April, 2026.

*Mariana Braylovskiy*

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

