

No. \_\_\_\_\_

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IN THE  
SUPREME COURT OF THE UNITED STATES

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VICTOR GAVALO,  
*Petitioner,*

-v.-

UNITED STATES OF AMERICA,  
*Respondent.*

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**CERTIFICATE OF SERVICE**

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I have caused a copy of the Petition for a Writ of Certiorari, and an Application for Leave to Proceed *In Forma Pauperis*, to be served by Federal Express on the Honorable D. John Sauer, Solicitor General of the United States, Department of Justice, 950 Pennsylvania Avenue, N.W., Room 5614, Washington, D.C. 20530-0001.

Dated: New York, New York  
September 17, 2026



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