

AFFIDAVIT OF SERVICE

SUPREME COURT OF THE UNITED STATES

No. 26-91

-----X

RICHARD STUART ROSS,

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 *Amici Curiae* the Manhattan Institute and Kansas Justice Institute.

That on the 20th day of August, 2026, I served the within *Brief of the Manhattan Institute and Kansas Justice Institute as Amici Curiae Supporting Petitioner* in the above-captioned matter upon:

Stephen Francis Raiola
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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 Amicus Curiae Brief through the Overnight Next Day Federal Express, postage prepaid.

That on the 20th day of August, 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.

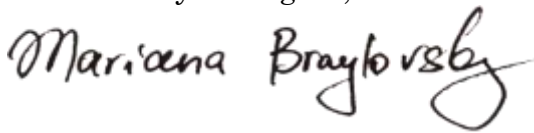
I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of August, 2026.



Ann Tosel

Sworn to and subscribed before me
this 20th day of August, 2026.



MARIANA BRAYLOVSKIY

Notary Public State of New York

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2030



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