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Newsletter

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SUPREME COURT GRANTS CERTIORARI TO *BLAKELY* RETROACTIVITY CASE

The U.S. Supreme Court granted certiorari on June 5, 2006, to hear a state of Washington case, *Burton v. Waddington* (05-9222), that questions whether the Supreme Courts' decision in *Blakely v.*

Washington, 542 US 296 (2004), should be considered a new rule of constitutional law and apply retroactively to cases, allowing prisoners who were sentenced under older and unconstitutional schemes to reopen their cases and challenge their sentences.

legally essential to the punishment must be charged in the indictment and proved to a jury.”

More pertinently to Defendant's cases, is the holding that the maximum sentence a judge may impose must solely be based on the facts reflected in the jury verdict or admitted by the defendant. *Blakely*,

Some of the factors that sentencing judges have considered in the past to increase defendant's sentences were not proven beyond a reasonable doubt to a jury, and thus were not available for use by a judge when sentencing defendants. Some example of such factors are drug amount, weapon enhancements, amount of victim

Blakely v. Washington which was decided on June 24, 2004. Clarified and reinforced the landmark *Apprendi* opinion that held that a defendant's sentence cannot be enlarged based on facts – except in relation to prior convictions – not proven beyond a reasonable doubt by a jury. A footnote of the *Blakely* decision is revealing:

“... every fact which is

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loss, the "severity" of the crime, a leadership role in a conspiracy, and obstruction of justice, among others.

In *Burton*, the defendant, incarcerated and in his early 40s, claims in his case that his sentence is unconstitutionally long under *Blakely v. Washington*. Burton further claims that the *Blakely* decision should be applied retroactively to his 1994 conviction, in which case his sentence would be slashed by about 21 years, by running all of his sentences concurrently as opposed to consecutively. The state court judge in Burton's case ran his sentences consecutively because of the age of the victim and heinousness of the crime among other factors not proven to a jury beyond a reasonable doubt.

Burton's appeal was rejected by the U.S. District Court in Seattle last July, and then unanimously by a three-judge panel of the 9th U.S. Circuit Court of Appeals.

Burton is arguing that his consecutive sentences, were inherently "exceptional" under state law, and the subject of judicial fact finding, in a now illegal fashion.

The case will likely be heard by the Supreme Court this fall, but it is of the utmost importance for Defendants to begin now reviewing their cases for *Blakely* errors in order to have their case ready for presentation should the Supreme Court rule favorably. It is more important than ever to now preserve *Blakely* issues for later review and to take all possible steps in determining whether the issues are available to defendants, as overturning an unconstitutional

sentence could greatly reduce their term of incarceration.

SENTENCING COMMISSION RELEASES POST-BOOKER REPORT ON FEDERAL SENTENCING

On March 13, the United States Sentencing Commission released on its website an electronic version of its report on the impact of United States v. Booker sentencing in the federal courts. The report titled, "Final Report on the Impact of *United States v. Booker* on Federal Sentencing" can be found at www.ussc.gov/booker-report/Booker_Report.pdf. The report demonstrates that district courts are utilizing their new found authority and discretion at sentencing in individuals cases. Among the significant findings of the report:

Cooperation Reductions without a Government Motion

Non-government-sponsored, below-range sentences based on the defendant's cooperation with authorities, *i.e.*, below-range sentences granted for substantial assistance without a government motion for such, occur post-*Booker*. Post-*Booker*, there were 258 cases in which cooperation with authorities was given as a reason for the imposition of a non-government-sponsored, below-range sentence. In 28 of these cases, substantial assistance or cooperation with authorities was the only reason cited. In 230 of these cases, it was one of a combination of reasons for the below-range sentence.

This is significant. Prior to *Booker*, one of the most unfair provisions under the Guidelines was that the prosecution retained the sole

discretion under § 5K1.1 whether or not to file a downward departure motion based on a defendant's cooperation. Technically, the sentencing courts had no authority to consider a defendant's offered cooperation, or cooperation that was not beneficial to the government. The door was left open for the government to mislead a defendant into pleading guilty based on a false belief that his/her cooperation would result in a lower sentence. However, if that defendant did not possess important information that could benefit the government, these defendants would receive no reward for their often dangerous attempts to cooperate.

The Commission's findings show that this has drastically changed after *Booker*. The government no longer holds all of the cards in terms of rewarding a defendant for his or her attempts to cooperate with the government and the courts have recognized this.

Crack Cocaine Offenses

Courts have also used their discretion in certain cases to use *Booker* or the factors under 18 U.S.C. § 3353(a) to impose below-range sentences in crack cocaine cases. Although not the majority, many courts explicitly cite crack cocaine/cocaine powder sentencing disparity as a reason to impose below-range sentences in crack cocaine cases. Significantly, prior to *Booker*, this was a forbidden factor for a court to consider.

First Offenders

Although the proportion of first offenders receiving prison sentences has remained essentially the same, as has the average length of sentences imposed, the rate of

imposition of below-range sentences for first offenders increased after *Booker*. Therefore, the courts are recognizing in certain instances that a defendant's lack of criminal record calls for a sentence independent and below any applicable range of imprisonment under the Guidelines.

Career Offenders

Similarly, the rate of imposition of below-range sentences for career offenders increased after *Booker*. The majority of the cases in which below-range sentences are being imposed for career offenders are drug trafficking cases. District courts have recognized that the career offender enhancement often results in a sentencing range that is greater than necessary to achieve the goals of sentencing and the average length of sentences imposed for career offenders has decreased after *Booker*.

So what does the Commissions' findings mean for individuals facing sentencing in the federal courts? It means that creative and reasonable arguments can be made in almost any case that calls for a sentence below the Guidelines. In the past NLPA was commonly successful in helping attorneys argue for reduced sentences based on its' creative and cutting edge research. That success has increased after *Booker*. Additionally, the availability of non-traditional sentencing arguments have also increased after *Booker*. There are more potential sentencing issues that NLPA's research attorneys can highlight for defense counsel than ever before.

Of course, factors that can be

addressed change from case to case and from court to court. However, if an argument for a sentencing below the Guideline range is not made, the court will likely impose a sentence within the Guidelines. If you or some one you know is in need of NLPA's research assistance at sentencing, please contact us.

ON THE IMPORTANCE OF JURY SELECTION

Here at NLPA, many criminal defendants and their attorneys seek our assistance, arguing that a trial was unfair due to evidentiary issues, sentencing issues, or prosecutorial misconduct. However, by the time a criminal trial starts, the defendant may have already been unconstitutionally prejudiced by the prosecution and the trial court. Such prejudice is not due to the withholding of evidence or improper statements, but via improper jury selection. In those trials where capital punishment is an option, insuring that jury selection is handled in a constitutional manner may allow the defendant to be tried upon the merits of his case instead of the bias of the jury.

During voir dire in a capital case, the prosecution will almost universally inquire as to each potential juror's willingness to utilize the death penalty should a conviction be had. Of course, many humane jurors state that they are opposed to the death penalty, but would consider such a drastic penalty in case of a conviction because they are required to do so by law. Predictably, the prosecution will strike such jurors, often blatantly saying that such jurors were removed because of their views on the death penalty.

However, such action by the prosecution seemingly undermined the Sixth Amendment's guarantee to an impartial trial by one's peers.

Beginning in the 1960's, the Legal Defense Fund, working in conjunction with the NAACP, began the charge against the impropriety of such jury practices. As a result, in Maxwell v. Bishop, 398 U.S. 262 (1970), the United States Supreme Court ruled that "a sentence of death cannot be carried out if the jury that imposed or recommended it was chosen by excluding venire men for cause simply because they voiced general objections to the death penalty or expressed conscientious or religious scruples against its infliction." While it was still permissible to exclude potential jurors because of an unyielding stance not to apply the death penalty in any situation, those that were opposed to the death penalty but stated that they would consider such punishment because it was their duty as jurors could not be excluded for their distaste of the death penalty. Furthermore, the Court noted that a juror must unambiguously state his inability to apply the death penalty in any situation to be dismissed from service. A jury could not be dismissed, however, based upon the possession of "conscientious scruples" about the death penalty.

The decision reached in Maxwell built upon that issued in Witherspoon v. Illinois, 391 U.S. 510 (1968). In Witherspoon, the Court stated that dismissing jurors opposed to the death penalty made the jury unconstitutionally prone to return a death sentence. As eloquently stated by Justice Stewart,

a jury that must choose between life imprisonment and capital punishment can do little more -- and must do nothing less -- than express the conscience of the community on the ultimate question of life or death. Yet, in a nation less than half of whose people believe in the death penalty, a jury composed exclusively of such people cannot speak for the community. Culled of all who harbor doubts about the wisdom of capital punishment -- of all who would be reluctant to pronounce the extreme penalty -- such a jury can speak only for a distinct and dwindling minority.

Id. at 519. Furthermore, Justice Stewart went on to note that the division between those who believe in the death penalty and those who do not is not a division

between rich and poor, highbrow and lowbrow, Christians and atheists: it is between those who have charity and those who have not. . . . The test of one's humanity is whether one is able to accept this fact -- not as lip service, but with the shuddering recognition of a

kinship: here but for the grace of God, drop I.

Id. at 520 (citing Koestler, *Reflections on Hanging* 166-167 (1956)).

The fact that the death penalty has fallen out of favor in ever increasing numbers since the decision issued in Witherspoon in clear from a glance at the world map. Only one nation from Western Europe and North America still permits the use of the death penalty, the United States. In fact, in allowing the death penalty, the United States finds itself in the company of such nations as Cuba, Nigeria, Iraq, Iran, Indonesia, North Korea, and Libya. Clearly, the United States finds itself in the company of brigands and terrorists. If the death penalty cannot be abolished, counsel has a duty to at the very least insure that those jurors who share civilized thoughts with non-death penalty nations must remain on the jury.

The fact that the death penalty is a barbaric form of punishment has not been lost on the Supreme Court, which has continued to uphold the role of the scrupulous juror in Morgan v. Illinois, 504 U.S. 719 (1992). In that case, not only did the Court uphold the prohibition for striking jurors based upon their opposition to the death penalty, but the Court also stated that a due process violation occurs anytime a juror is kept on a jury when said juror states that he will apply the death penalty automatically should conviction occur, refusing to consider alternate punishments. With the Morgan ruling, not only had the Court's distaste for the death penalty been voiced, but criminal

defendants were given the ability to challenge improperly composed juries through the Due Process Clause of the Fifth and Fourteenth Amendments. With the sword and shield that is the Fifth, Sixth and Fourteenth Amendments, defense attorneys must remember to vigorously defend their clients during jury selection. Not only will such defense lessen the chance that a client receives the death penalty, but also lessens the chance that a defendant will be found guilty, as scrupulous jurors will weigh the facts as presented instead of approaching the trial as a foregone conclusion against the defendant. The bottom line is that the prosecution must be challenged when it starts to remove those jurors who express concern over the death penalty.

RECENT CASES YOU CAN USE

Double Jeopardy - The defendant's conviction of an offense and a lesser-included offense violated his right against double jeopardy. A defendant's conviction and sentencing for possession with intent to distribute cocaine base within 1000 feet of a school and the lesser-included offense of possession with intent to distribute cocaine base, based on facts arising from the same incident, was plain error. The plain error affected the defendant's substantial Fifth Amendment right to be free from duplicative prosecutions and punishment. US v. Jackson, 2006 WL 861181 (3d Cir. 2006)

Habeas limitations period applies to §2241 petitions. On an issue of first impression, the Tenth Circuit Court of Appeals has held that the one-year habeas limitations period applies even when the petition challenges a pertinent administrative decision rather than a state court judgement. Agreeing with the majority of circuits

that have considered when the limitations period commences on an administrative decision, the Tenth Circuit concluded that, where a state prisoner timely and diligently exhausts his administrative remedies, the limitations period does not commence until the decision rejecting the administrative appeal becomes final. The date on which the factual predicate of the claim could have been discovered through the exercise of due diligence - thus commencing the limitations period - becomes the date that the denial of his administrative appeal become final. Dulworth v. Evans, 2006 WL 856234 (10th Cir. 2006)

Defendant's girlfriend lacked authority to consent to search of his shaving kit located inside suitcase in hotel room. A defendant's girlfriend lacked actual or apparent authority to consent to a search of the defendant's shaving kit, which was located inside of his suitcase, which was located inside a hotel room that the two shared. The items involved in the search, the suitcase and the shaving case, were personal to the user. The girlfriend identified the items as belonging to the defendant. Testimony also made clear that the contents were wholly male. The girlfriend seemed uncertain of the contents of the suitcase, which was closed and sitting against the wall. There was no indication that she had been given permission to access either item or that she mutually used either item. The girlfriend informed the police that the defendant was hiding drugs from her and that they might be hidden in the suitcase or shaving kit. Margaret v. State, 31 Fla. L. Weekly D950, 2006 WL 846752 (Fla. Dist. Ct. App. 5th Dist. 2006)

Ninth Circuit says that family ties may warrant non-guidelines sentence even if they do not support departure. Under §5H1.6, family ties and responsibilities are not ordinarily relevant in determining whether a departure is warranted. The district court departed downward in a

part because defendant was the sole parent of her child and had an unusually strong relationship with the child. The 9th Circuit upheld the departure, but noted that even if the court erred in departing, a court may after *Booker* now consider family ties and responsibilities as part of the "history and characteristics" of the defendant under 18 USC §3553(a)(1). Balancing that factor against the other factors under §3553(a), the court held that the defendant's sentence was reasonable. US v. Menyweather, F.3d (9th Cir. Dec. 16, 2005) No. 03-50496.

Evidence did not establish that defendant exercised custody or control of cocaine so as to support possession of conviction. The evidence presented was insufficient to establish that a defendant exercised actual care, custody, control, or management of cocaine so as to support his possession conviction. Although the defendant was found seated arm's length away from numerous baggies and pill containers of crack cocaine in plain view during the search of a home, the home was not the defendant's. The defendant did not take any action to try to conceal the drugs, and the police did not fingerprint the baggies or pill bottles to determine whether the defendant touched them. The \$160 found on the defendant did not yield an inference of illegal activity. When the defendant was arrested, he was not under the influence of narcotics, did not possess other contraband, narcotics or drug paraphernalia and did not attempt to flee. There was no evidence of either an odor of contraband in the home or the presence of other contraband or drug paraphernalia. Evans v. State, 2005 WL 2860000 (Tex. App. San Antonio 2005).

Abuse of discretion in finding federal inmate ineligible for early release warranted habeas corpus relief. The abuse of discretion resulting from the decision of a the BOP not to recommend an inmate who

was convicted of conspiracy to commit money laundering for early release based on his completion of a residential drug abuse treatment program, due to the arbitrary and capricious determinations that the presence of firearms at the inmate's home prior to his arrest rendered the inmate ineligible for early release under a BOP program statement, warranted habeas corpus relief on due process grounds. The program statement, which deemed an inmate ineligible for early release if the inmate's offense involved the carrying, possession or use of a firearm or by its nature presented a serious potential risk of physical force against the person or property of another did not apply to the inmate, give that his offense did not itself present a serious potential risk of physical force and, that the firearms found in the inmates' home were not linked to his offense.

Denial of a defendant's request to discharge retained counsel resulted in denial of constitutional rights to counsel and due process. Denial of a non-indigent defendant's request to discharge retained counsel prior to a trial resulted in the denial of his constitutional rights to counsel and due process of law, thereby requiring automatic reversal of his conviction. The trial court applied the wrong standard to defendant's request, holding what was in essence a Marsden hearing for defendants with appointed counsel, by requiring defendant in the instant case to demonstrate that his counsel was providing inadequate representation or that he and his attorney were embroiled in an irreconcilable conflict. People v. Hernandez, 2006 Daily Journal DAR 5420, 2006 WL 1195634 (Cal. App. 2d Dist. 2006)

Appeal of Sentence (18 USC §3742). 9th Circuit holds that waiver of right to contest sentence in post-conviction proceedings does not waive right to appeal. In a plea agreement, defendant waived "the right to contest either the conviction or the sentence or the

application of the sentencing guidelines in any post-conviction proceeding including any proceeding under 28 USC §2255". The 9th Circuit held that because this waiver did not refer to direct appeals, it did not bar defendant from appealing his sentence under 18 USC §3742. US v. Speelman, F.3d (9th Cir. Dec. 16, 2005) No. 04-30067

CASES AT A GLANCE

US v. Herrera (10th Cir. April 20th, 2006 No. 05-3057. A conviction for drug related offenses is vacated pursuant to a claim of erroneous denial of a suppression motion where a stop of a defendant's truck violated the Fourth Amendment has his truck was no subject to a state regulatory scheme that permitted random inspections of certain commercial vehicles, and the good-faith exception to the exclusionary rule did not apply under the circumstances.

Rolan v. Vaughn (3rd Cir. April 18th, 2006 No.04-4322. Grant of a writ of habeas corpus to defendant in a first-degree murder case is affirmed where under Strickland, defendant's attorney's failure to investigate self-defense witnesses fell below an objective standard of reasonableness and there was a reasonable probability that but for such failure the result would have been different.

US v. Davenport (4th Cir. April 21, 2006 No. 05-4304. Ten-year sentence following guilty plea to fraudulent use of an access device is vacated where the length was unreasonable. Restitution ordered was in error where the district court: (1) failed to make sufficient factual findings; (2) Ordered restitution to non-victims; (3) required defendant to pay substantially more than allowed by statute.

Fulcher v. Motley (6th Cir. April 18, 2006 No. 03-6216. Denial of a petition for writ of habeas corpus challenging a conviction and life sentence for murder, burglary and robbery is

reversed where admission of statements made by defendant's girlfriend who, later became his wife, violated his rights under the Confrontation Clause of the Sixth Amendment and the error was not harmless.

US v. Fowler (8th Cir. April 17, 2006 No. 05-2532. A sentence pursuant to a plea to bank robbery is reversed where the government materially breached its plea agreement by advocating for the imposition of a career-offender enhancement despite its promise to recommend that the District Court calculate defendant's sentence based on an offense level that did not include such enhancement.

US v. Arbane (April 21, 2006 No. 04-15727). Conviction for conspiracy to import cocaine into the US is reversed where the evidence is insufficient to demonstrate that anyone other than a governmental informant was involved with defendant in an agreement to import drugs.

IMMIGRANTS/ALIEN OBTAIN LEGAL RELIEF AND NLPA ACHIEVES ANOTHER VICTORY

Virtually every day, National Legal Professional Associates (NLPA) receives requests from defendants who are not United States citizens whom the government is threatening to deport back to their home country. Many have lived in the United States since they were only a few years old and have their entire family present with them in the United States. If the government would deport them back to their home country, it would cause tremendous hardships to the defendant and his/her family. Furthermore, many times the United States government is threatening to deport a defendant to a country where political corruption is rampant and where they will be subject to torture and inhumane treatment. In spite of this, the government often appears to

be totally insensitive to the rights of the defendants to be with his family and to avoid torture and inhumane treatment.

The case of Reginald Castel is a perfect illustration of how this battle can be fought successfully. Mr. Castel is a citizen of Haiti. Mr. Castel has resided in the United States since 1982. In 1999, he unfortunately became involved in a dispute with another individual which resulted in his being convicted of assault and sentenced to eight years imprisonment. Notwithstanding the fact that his wife and children were United States citizens, the government then proceeded to attempt to deport him back to Haiti. With the help of NLPA Mr. Castel was able to win his BIA appeal and remain in the United States.

SUMMARY OF OTHER RECENT SUCCESSFUL CASES

Since NLPA's newsletter in January we have had 16 successful cases. In addition to the sentencing successes, we are seeing more and more recently the trend of appeals being successful in the Federal Court of Appeals. In all of the cases below these cases were remanded for the *Booker* decision. It is usually not a common result of us to see so many appeal victories however, this was exactly what our attorneys were projecting when reviewing the *Blakely* decision and the possible effects it would have on defendants in the Court of Appeals. These cases are set forth below.

Barnum, L. - NLPA assisted Mr. Barnum's counsel in preparing for sentencing to help attack a PSI recommendation of 360-480 months in prison. At the sentencing Mr. Barnum only received a term of 96 months in prison - saving him more than **22 years in prison!**

Pride, A - NLPA assisted Mr. Pride's counsel in the preparation of sentencing research to fight a guideline range of 188-235. Mr. Pride received

151 months in prison. This saved him more than 3 years in prison.

Chiolo, M - NLPA assisted counsel in attacking a guideline range of 120-125 months at sentencing. As the result of our research, Mr. Chiolo received a term of 78 months in prison - saving him more than 4 years in prison.

Smith, M. - NLPA assisted counsel for Mr. Smith in the preparation of an appeal to the Sixth Circuit. Mr. Smith's case was remanded back to the District Court for a resentencing.

Cedillo, J - NLPA assisted Mr. Cedillo's counsel in attacking a PSI recommendation of 210-262 months. At his sentencing hearing the judge imposed a term of 180 months - saving Mr. Cedillo more than three years in prison.

Patmon, C - NLPA assisted Mr. Patmon in the pretrial stage of his case. We prepared and were victorious, among other items, in a Motion to Suppress. We received a call from the client's family in January advising that they were grateful for the work which we had completed because all charges against Mr. Patmon had been dropped and he was released!!!! The government has since filed appeals of this decision but, they have been denied.

Gallimore, L - NLPA assisted counsel for Mr. Gallimore in the preparation of an appeal to the Eleventh Circuit. The government later conceded and the case was granted a remand back to the District Court for a resentencing based on *Booker/FanFan*.

Hardman, P - NLPA assisted Mr. Hardman's counsel in the preparation of an appeal to the Sixth Circuit. His case was remanded in February for a resentencing based on our research.

Duran-Colon, E -NLPA assisted counsel for Mr. Duran-Colon to help fight a guideline range recommendation of 97-121 months. At

his sentencing, Mr. Duran-Colon received 84 months - saving him more than a year in prison.

Hunt, B -NLPA assisted Mr. Hunt and his attorney at the sentencing level of his case. He was facing a guideline recommendation in his PSI of 120 months plus 60 months consecutive. At his sentencing, Mr. Hunt received on 61 months total - saving him **ten years** in prison!

Mukendi, K- NLPA assisted counsel with the preparation of a BIA Appeal for the purpose of preventing Mr. Mukendi from being deported to Zaire. The court agreed with our position and remanded the case back to the immigration court to reassess the asylum application.

Santana, M - NLPA assisted counsel for Mr. Santana in attacking a guideline range of 108-135 months in his PSI. Mr. Santana's case involved cocaine conspiracy. At sentencing, the judge imposed a term of 87 months - saving Mr. Santana more than four years in prison.

McKenzie, G - NLPA assisted with sentencing. Defendant was facing 108-135 months in his PSI. With our help he received 97 months - saving him more than a year in prison.

Medas, K - NLPA assisted Attorney Estelle Rood in an appeal to the Second Circuit. The courts affirmed the conviction but, remanded the case back to the District Court for a resentencing.

Brinson, I - NLPA assisted counsel in an appeal to the Eleventh Circuit with Attorney Charles Murray. Mr. Brinson's case was remanded back to the District Court for a new sentencing.

INTERESTED IN HIRING NLPA?

If you're considering hiring someone to assist with your criminal proceedings, NLPA offers realistic fees that may suit you in your pursuit of

finding top-notch yet affordable legal research & consulting assistance. We believe you will find our fees to be extremely competitive compared to other legal research firms in the country. We also have several alternative options for paying our fees.

- NLPA can accept payment via cashier's check or money order through the mail.
- We also can accept credit/debit card payments over the telephone as well as electronic check (check by phone) payments over the telephone.
- For most services provided NLPA also offers payment plans as well. With a minimum down payment you could soon be financing your legal fees.

Therefore, if you are interested in discussing the financing options available to you for your specific matter, please contact us.

NLPA assists in virtually every stage of criminal proceedings from pretrial to post-conviction and also assists in immigration matters. For additional information on the services offered by National Legal Professional Associates please contact our offices.

THIS NEWSLETTER IS DESIGNED TO INTRODUCE YOU TO NLPA. AS NLPA IS NOT A LAW FIRM, PROFESSIONAL SERVICES ARE ONLY PROVIDED TO LICENSED COUNSEL IN ALL AREAS THAT INVOLVE THE PRACTICE OF LAW. NLPA HAS CREATED THIS PUBLICATION TO PROVIDE YOU WITH AUTHORITATIVE AND ACCURATE INFORMATION CONCERNING THE SUBJECT MATTER COVERED. HOWEVER, THIS PUBLICATION WAS NOT NECESSARILY PREPARED BY PERSONS LICENSED TO PRACTICE LAW IN A PARTICULAR JURISDICTION. THIS PUBLICATION IS NOT MEANT TO BE A SUBSTITUTE FOR LEGAL OR OTHER PROFESSIONAL ADVICE, WHICH NLPA IS NOT RENDERING HEREIN.

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About NLPA

NLPA is a research and consulting firm, owned and staffed by attorneys, and dedicated to the professional mission of providing counsel, research, and related work product to members of the Bar. Our ownership structure includes attorneys licensed to practice before many local, state, and federal courts; however, NLPA is not a law firm and provides no "front line" legal services. On the other hand, we are much more than your typical paralegal service as our work is prepared by attorneys. Our sole purpose is to provide research and consulting assistance by lawyers, for lawyers . . . and their clients. With cutting-edge computer research capabilities, an experienced and top quality staff, and more than sixteen years' experience, NLPA is well-positioned to provide the types of assistance members of the Bar need.

You are important to us and we hope we can commence and maintain a long-term relationship with you. Please know that we are here to assist in all your needs.

If you would like to know more about the services we offer, please contact us at:

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