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“The pursuit of justice is a team effort.”

Newsletter

Legal News Briefs for Law Libraries & Defense Attorneys

BILL SEEKS TO CUT DISPARITY IN COCAINE SENTENCES

A recent Washington Times article announced a bipartisan group of four US senators has recently presented legislation to reduce the disparity in prison sentences for those caught with crack cocaine and those caught with powdered

cocaine. The current disparity for federal sentencing is 100to1 and would be reduced to 20to1. Presenters of a similar bill from 2001 stated The Drug Sentencing Reform Act of 2006 would reduce the disparity by decreasing the amount of crack cocaine needed to trigger the mandatory minimum sentencing and introducing a “modest increase on powders”.

As it stands now, possession of 500 grams of powder cocaine results in a five-year mandatory minimum term of imprisonment. It only requires 5 grams of crack cocaine to warrant a similar sentence. The proposed shift is reducing the amounts to 400 grams of powder and 20 grams of crack.

The bill would in turn bring tougher sentences to the most

violent drug offenders while bringing less harsh sentences on lower-amount, non-violent offenders by shifting the attention from drug quantity to the type of criminal act committed in distributing the drugs.

The crack/cocaine disparity has resulted in higher incarceration rates for African-Americans convicted of drug crimes and has been targeted by civil rights groups for a long time now.

The proposed bill seeks to reduce the disparity between crack and cocaine due to the increased danger of crack compared to cocaine. Cocaine is usually snorted and crack is smoked. Tests indicate that crack is much more addictive than cocaine and causes more violence than cocaine.

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NLPA is monitoring this important legislation and will advise when, and if, the law is changed.

**THE GROWING PROBLEM:
PRISONS THROUGHOUT THE
COUNTRY ARE PACKED FULL
- WHAT CHANGES CAN WE
EXPECT?**

With the recent elections we hope that the outcome of the votes will translate into some modifications to the way our prison systems are run. Recent studies are showing that most of the inmates filling up the

prison facilities have not even been convicted yet! Many of the remaining inmates are those who have been convicted and are carrying out their time. But, with the continuous rush of new prisoners this must pose the question of what better alternatives can be offered?

Recent studies show that prisons and jails added more than 1000 inmates each week for a year, putting almost 2.2 million people (or 1 in every 136 US residents) behind bars last summer. The total from 2004 to 2005 was an increase of 2.6% representing the largest increase since 1997. Prisons accounted for about 2/3 of all inmates while the other 1/3 were in local jails.

When interviewed about this matter, Beck, the Bureau's chief of corrections statistics said "The jail population is increasingly unconvicted. Judges are perhaps more reluctant to release people pretrial". In fact, Justice Department reports show that 62% of people in jails have not been convicted and are awaiting trial.

How does this translate for your state? Well, the states with the lowest rates were Maine, Minnesota, Rhode Island, Vermont and New Hampshire. Maryland was one of 12 states bucking the trend by reporting a **decrease** in its population. One reason for this may be Governor Robert Ehrlich who is leading the state toward a policy of treatment rather than just incarceration of drug offenders (who make up a large portion of the prison population).

Although investing money into treatment options for pretrial or prerelease inmates may also be costly - it cannot even compare the national cost of housing an inmate in a prison or jail during this period of time.

So, what can the rest of the country learn from this? Well, we can only hope that national attention will be directed toward the states who are implementing a different approach with their inmates including early release with treatment, pretrial releases for drug related cases, etc. Not only would this assist in opening up space in our jail facilities but, would reduce costs and, would also bring us back to the basics of why these inmates are really being sent to prison - REHABILITATION.

When it all boils down, the fact of the matter is that we spend so much money housing defendants that could be out on bonds or in treatment centers to extend the rehabilitation that they have achieved in prison that it is growing impossible to let the prisons serve as the beginning of a rehabilitative step for these inmates. If the United States were to look at the figures and review

their determination procedures for bonds and prerelease opportunities for many of these inmates, there is no doubt that many of our problems may take a turn for the better. Critics will agree that with the recent troubles in our Social Security and Immigration regulations that we would much rather see many of these inmates released back into society to work and contribute to the costs of these problems equally with the rest of the population than have them sit in jail and require the rest of the population to pay insane amounts of money in housing costs that aren't necessary.

Only time will tell to determine what the recent elections will achieve. Unfortunately most of those who are affected by the requirement that they remain in these prisons could not vote but, that's a whole separate debate.

**THE EFFECTS SENTENCING
GUIDELINES HAVE ON
OVERCROWDED JAILS**

One must wonder in a nation seemingly as developed as the United States why prison population rates are so drastically high. Two main reasons exist for this disproportionate number. First, the penalty discrepancies between crack and powder cocaine serve to insure that those involved with crack cocaine are incarcerated much longer than is necessary to achieve the goals of sentencing. Second, the use of sentencing Guidelines that, instead of focusing on the particular facts applicable to any given defendant in order to reach a reasonable sentence, blindly applies like sentences to tangentially alike defendants. Such practices serve to insure that, instead of creating a situation where efforts are made to

rehabilitate individuals in an effort to make them responsible contributors to society, the United States remains a backward nation in its treatment of convicted individuals.

Although crack cocaine and powder cocaine cause similar physical reactions, the sentences that users and sellers of the drugs face are vastly different. For powder cocaine, a conviction of possession with intent to distribute carries a five-year sentence for quantities of 500 grams or more. But for crack, a conviction of possession with intent to distribute carries a five-year sentence for only 5 grams. This is a 100:1 quantity ratio. Under this format, a dealer charged with trafficking 400 grams of powder, worth approximately \$40,000, could receive a shorter sentence than a user he supplied with crack valued at \$500. Crack is also the only drug that carries a mandatory prison sentence for first offense possession. A person convicted in federal court of possession of five grams of crack automatically receives a five year prison term. A person convicted of possessing five grams of powder cocaine will probably receive a probation sentence. The maximum sentence for simple possession of any other drug, including powder cocaine, is 1 year in jail. In addition to the federal mandatory minimum sentences, 14 states differentiates between crack and powder cocaine. Further, this discrepancy unfairly targets minorities, as more than three-quarters of crack possession convictions involve African-Americans, while more than half of powder cocaine possession convictions involved whites.

The United States Sentencing Commission has since realized the ridiculousness of such

a disparity. The Commission has found that the 100:1 ratio overstates the seriousness of crack cocaine related offenses, and that said ration undermines the goals of reasonable sentencing as put forth by 18 U.S.C. § 3553(a). (United States Sentencing Commission's 2002 report, Chapter 8) ("After carefully considering all of the information currently available. . . the Commission firmly and unanimously believes that the current federal cocaine sentencing policy is unjustified and fails to meet the sentencing objectives set forth by Congress in both the Sentencing reform Act and the 1986 Act."). However, the judiciary has continued to sentence defendants according to the archaic discrepancy between crack and powder cocaine as codified in the United States Sentencing Guidelines and United States Code.

There can be no doubt, with the decisions announced in Blakely v. Washington and United States v. Booker, that the United States Sentencing Guidelines are merely advisory. However, courts across the nation have ignored these rulings, instead stating that sentences issued within the advisory guidelines are presumptively reasonable. So long as lip service is paid to reasonableness factors, a sentence within the mandatory Guidelines is virtually unassailable. Therefore, the man who steals a loaf of bread to feed his family will receive a sentence quite similar to a man who steals a radio in order to pawn it and make money. Put another way, one who possesses crack cocaine, despite the fact that said drug has similar effects as powder cocaine, will be sentenced much more harshly than one possessing powder cocaine. Although one

would assume that the judiciary of a civilized society would have the freedom and intelligence to distinguish between such criminal acts and issue sentences accordingly, the American judiciary has blindly continued to follow the imposition of the sentencing Guidelines. Therefore, individuals will continue to be sentenced well beyond the needs of deterrence and rehabilitation.

Given the grave state of the American sentencing system, from the judiciary to the Department of Corrections, it is imperative that defendants enlist all aid at their disposal. National Legal Professional Associates is at the forefront of the fight against unjust sentencing practices, and continues to make cutting edge arguments in an effort to circumvent unjust and impractical sentencing practices by the American judiciary. Should you find yourself facing the up hill struggle of sentencing, do not hesitate to contact NLPA to assist you in your fight for justice!

SUPREME COURT TO REVISIT FEDERAL SENTENCING ISSUES

Now that it has been nearly two years since the widely debated decision to make the application of the sentencing guidelines advisory, will we finally get an answer as to what "advisory" means?

The New York Times recently published on November 4th an article which stated the court took the first step toward answering those important questions. From dozens of pending appeals, the justices selected two cases to resolve two of the most pressing issues in federal sentencing. Both issues have divided the lower federal courts.

The first is whether a sentence that is within the range of the formerly mandatory guidelines should be presumed to be reasonable, a presumption that effectively insulates the sentence from challenge on appeal. The second issue is what a federal judge has to do to justify a sentence that is substantially shorter than the lowest sentence the guidelines provide.

The case that made the sentencing guidelines advisory, *United States v. Booker*, was extremely closely fought, with shifting coalitions of justices addressing the constitutionality of the guidelines and the permissible remedy for the problem. Of the five justices who supported the remedy of making the guidelines advisory, two are no longer on the court, Sandra Day O'Connor and [William H. Rehnquist](#), then the chief justice.

What approach their replacements, Justice [Samuel A. Alito Jr.](#) and Chief Justice [John G. Roberts Jr.](#), will take toward the court's current doctrine on the respective roles of judges and juries remains to be seen. While there was no suggestion in the court's action on Friday that the Booker decision itself would be reconsidered, there remains much room for debate over how it should be applied.

Each of the appeals was brought to the Supreme Court by a federal public defender's office. The defendant in the first case, from North Carolina, is a 57-year-old retired marine named Victor A. Rita Jr., who was convicted of making false statements in connection with a federal investigation into the sale of kits for making machine guns.

While Mr. Rita's sentence, 33 months, was within the range provided by the sentencing guidelines, he argued on appeal to the United States Court of Appeals for the Fourth Circuit that the sentence was unreasonably long, given his poor health and unblemished record of federal service, both as a marine and in two civilian agencies.

But the Fourth Circuit, which is based in Richmond, Va., and includes North Carolina, is one of the federal circuits that have adopted a presumption of reasonableness for sentences within the guidelines range. The appeals court consequently rejected his appeal in a brief unpublished opinion.

In the Supreme Court appeal, *Rita v. United States*, No. 06-5754, the public defender's office in Greensboro, N.C., is arguing that, as a practical matter, the presumption of reasonableness has the effect of making the guidelines mandatory once again, contrary to the Supreme Court's ruling in the Booker case.

In that case, decided in January 2005, the court ruled that the sentencing guidelines were unconstitutional because they gave judges the responsibility to make factual determinations on which defendants have a right to trial by jury. The court then held that the problem could be cured by making the guidelines advisory rather than mandatory, setting up a system that required judges to "consider guidelines ranges" under a general requirement of "reasonableness."

In accepting Mr. Rita's appeal, the Supreme Court said it would decide whether it was "consistent

with *United States v. Booker* to accord a presumption of reasonableness to within-guidelines sentences."

The defendant in the second case the court accepted on Friday is a 21-year-old first offender, Mario Claiborne, who was convicted in Federal District Court in St. Louis of possessing a small quantity of crack cocaine. Mr. Claiborne's lawyer persuaded the trial judge to impose a sentence of only 15 months, sharply lower than the guidelines range of 37 to 46 months.

The United States Court of Appeals for the Eighth Circuit, also in St. Louis, overturned the sentence and ordered resentencing, which has not yet taken place. The Eighth Circuit is among the appeals courts that regard deviations from the guidelines as inherently dubious, requiring special justification.

Noting that Mr. Claiborne had received a sentence that was an "extraordinary" 60 percent lower than the low end of the guidelines range, the appeals court said that "an extraordinary reduction must be supported by extraordinary circumstances."

Mr. Claiborne's Supreme Court appeal, *Claiborne v. United States*, No. 06-5618, thus presents the other side of the coin: not whether it is presumptively reasonable to issue a sentence within the guidelines range, but whether it is presumptively unreasonable not to do so.

In accepting the case, the Supreme Court said it would decide whether it was "consistent with *United States v. Booker* to require that a sentence which constitutes a substantial variance from the

guidelines be justified by extraordinary circumstances.”

Nearly two years since the Supreme Court made the federal sentencing guidelines advisory rather than binding, the criminal justice system has been waiting anxiously to determine what “advisory” actually means and what discretion federal judges really have.

SENTENCING COURTS STRUGGLE TO FIND CONSISTENT POLICY AFTER BOOKER

According to the USSC statistics, in 2005 post-*Booker*, only 3.5% of sentences involved judge-initiated departures (up and down), while 11.1% of sentences involved *Booker* variances (up and down). So far in 2006, 6.1% of sentences have involved traditional departures while only 8% of sentences involved *Booker* variances. Comically even though the Seventh Circuit has repeatedly called departures “obsolete”, USSC data shows that its district courts so far in 2006 have departed in 6.7% of all cases, placing this circuit above the national average!

RECENT CASES YOU CAN USE

ATTORNEY’S FAILURE TO FILE NOTICE OF APPEAL IS INEFFECTIVE ASSISTANCE OF COUNSEL - An attorney who fails to file a Notice of Appeal is constitutionally ineffective even where the defendant waived his right to appeal in a plea agreement, according to 2nd Circuit Court of Appeals. In the recent case of Jose Campusano, who pleaded guilty in 2001 in the SD of NY, Mr.

Campusano filed a pro se 2255 motion raising ineffective assistance of counsel claiming that despite his promise not to appeal the sentence, he twice asked his attorney to file his notice of appeal but, his attorney did not do so. Campusano cited in his motion the case of **Roe v. Flores-Ortega, 528 US 470 (2000)** which held that failure to file a requested notice of appeal constitutes ineffective assistance and a defendant need not make an independent showing of prejudice. The circuit upheld that even if Mr. Campusano waived his appellate rights in a plea agreement, if he requested his attorney file a Notice of Appeal he ethically should have done so and should have subsequently filed an Anders brief on the appeal if he believed no meritorious issues existed for the appeal. The Second Circuit requires an Anders brief where a defendant has waived his right to appeal but, then goes on to file a pro se Notice of Appeal.

SEVENTH CIRCUIT HOLDS EX POST FACTOR NO LONGER APPLICABLE TO GUIDELINE CHANGES AFTER BOOKER - In what could be an extraordinarily important ruling, the Seventh Circuit today in *US v. Demaree*, No. 05-4213 (7th Cir. Aug. 11, 2006) essentially holds that pre-*Booker* ex post facto limits on the application of the most recent guidelines are no longer applicable now that the guidelines are advisory. This issue has not been thoroughly considered by any other circuit. But the ruling seems to cut against what nearly all district and circuit courts have been doing after *Booker*. All 8 pages are packed with highlights for sentencing geeks. Here's the final paragraph:

We conclude that the ex post facto clause should apply only to laws and regulations that bind rather than advise, a principle well established with reference to parole guidelines whose retroactive application is challenged under the ex post facto clause. As for the confession of error that the government makes in its brief, the assistant U.S. attorney who argued the appeal acknowledged that the government is waging a rearguard action against *Booker* and wants the guidelines to bind as tightly as possible because it believes that judges are more likely to use their *Booker*-conferred discretion to sentence below than above the guidelines sentencing ranges. This produces the paradox that while the ex post facto clause is intended to protect criminal defendants, it is here invoked by the government in the hope that it will lead to longer sentences. It is not an attractive argument

NINTH CIRCUIT SAYS CVRA DOES NOT GIVE VICTIM RIGHT TO PSR-The 9th Circuit, in a brief new per curiam opinion in **Kenna v. US District Court (CD of CA), No 06-73352 9th Cir, 2006** summarily rejects a crime victim’s claim that the Crime Victim’s Rights Act (CVRA) gives victims a right to obtain disclosure of a full presentence report. One sentence in the opinion hints that the victim’s arguments on appeal would have been stronger if he was willing to consider partial disclosure of the PSR. In a prior *Kenna* ruling the Ninth Circuit spoke grandly about the rights conferred by the CVRA to crime victims at sentencing. The circuit boldly asserted that the “statute was enacted to make crime victims full participants in the criminal justice system”. But, to be

a full participant in the sentencing process, a victim would need access to the PSR on the same terms that the prosecution and defense have access to it. However, the second time around in *Kenna* a broad vision of crime victims rights at sentencing do not carry the day.

CASES AT A GLANCE

US v. Espinoza-Cano No 05-10339 (9th Cir. August 8, 2006) The proper standard for a district court's review of a prosecutor's decision not to file a motion for a reduction for acceptance of responsibility under USSG §3E1.1(b) is the same standard for review of a decision to file a substantial assistance motion: the government may not refuse to file a motion on the basis of an unconstitutional motive or for reasons not rationally related to a legitimate government interest.

US v. Cheowith, No 05-20636 (5th Cir. August 8, 2006) Defendant's conviction and sentence for being a felon in possession of a firearm is vacated pursuant to a claim that the district court erred in denying his motion to dismiss his indictment based on a claim that a civil-rights restoration precluded his prior Ohio felony conviction from serving as the predicate offense for his felon-in-possession charge.

Jonah v. Carmona, 446 F.3d 1000 (9th Cir. 2006). Held that Congress intended for juveniles to receive custody credit for pre-disposition (pre-sentence) detention under 18 USC 3585. As a result, the BOP has issued directives to staff to comply. The BOP's compliance, as might be expected, is grudging and narrow.

US v. Scott, No 05-6082 (10th Cir, July 31, 2006). Tenth Circuit

concludes that the government its plea agreement by making arguments to the district judge in support of a sentencing after failing to object to the presentence report. Kelly dissents, and starts his opinion (which is longer than the majority opinion) with this paragraph:

The court holds that the government breached its plea agreement with Mr. Scott by discussing two sentencing enhancements after being specifically directed to do so by the district court. The court reasons that because no new facts were developed after the plea, the government was precluded from arguing any additional positions in favor of enhancements. Because this reasoning is supported by neither the applicable law nor the record, I respectfully dissent.

US v. Irizzary, No. 05-11718 (11th Cir. Aug. 1, 2006). Eleventh Circuit decided that "the district court was not required to give Defendant advance notice before imposing a sentence above the advisory guidelines range based on the court's determination that sentences within th advisory guidelines range did not adequately address §3553(a) sentencing factors.

RECENT NLPA SUCCESSFUL CASES

Since NLPA's newsletter in July we have had 13 successful cases. These cases are set forth below.

Bimbo, E. - NLPA assisted counsel for Mr. Bimbo in challenging his PSI report and possible sentencing enhancements which had him facing 70-87 months in prison. At his sentencing he received 57

months - saving him more than one year in prison.

Bolling, V - NLPA assisted Mr. Bolling's counsel in fighting his case wherein he was facing a PSI recommended term of 292-365 months. At his sentencing the judge imposed a term of 195 months in prison - saving him more than 10 years!

Rodriguez-Ferreira, J - NLPA assisted counsel for Mr. Rodriguez in preparing a §2255 motion. After considering by the courts of both parties' arguments, Mr. Rodriguez's appeal rights were reinstated.

Gopher, M - NLPA assisted counsel in the preparation of sentencing research for Mr. Gopher's case. He was *facing life in prison*. With our help he received a sentence of 18 years .

Krysheski, R - NLPA was hired directly by counsel in the case of Mr. Krysheski to assist in a bankruptcy case. With our help, the court vacated a dismissal of the case.

Mancha, G - NLPA assisted the firm of Robinson & Brandt in the preparation of a §2255 motion to reinstate Mr. Mancha's appellate rights and attack his sentence. Before the court issued its decision the government conceded that they felt Mr. Mancha's appellate rights should be reinstated. Later, the court adopted the report and recommendation and offered Mr. Mancha a new sentencing prior to the pursuit of his appeal.

Ozuna, M -NLPA assisted in the preparation of pretrial research for counsel in the case of Mr. Ozuna. We prepared numerous pretrial

motions for counsel to file and were advised that there was a hung jury in his case.

Palmer, D - NLPA assisted counsel for Ms. Palmer with her sentencing research to help attack a PSI recommendation of 135-168 months in prison. At her sentencing the judge imposed a term of 120 months - saving her more than one year in prison.

Payne, A - NLPA assisted counsel for Mr. Payne with his sentencing to help attack a guideline recommendation of 360-life. At his sentencing Mr. Payne was sentenced to 148 months in prison - saving him 17 to life in prison.

Yarbrough, C - NLPA was partially hired to prepare sentencing research in the case of Mr. Yarbrough. His PSI recommended a guideline range of 235-295 months in prison. Although we only were able to prepare a portion of our research on the case, we were advised that the court still only imposed a term of 160 months - saving him more than 6 years in prison!

Gore, R - NLPA assisted counsel for Mr. Gore in the preparation of sentencing research to attack his PSI recommendation of 210-262 months. At his sentencing he received a term of imprisonment of 135 months - saving him more than 6 years in prison.

Crimi, P - NLPA assisted counsel in the Crimi case in attacking a guideline recommendation of 262 months imprisonment. At sentencing the court imposed a sentence of 130 months - more than cutting his time in half and saving him more than 10 years in prison.

Santiago, C. - After much time had passed since preparing initial pretrial/pre-sentencing research, Mr. Santiago, a defendant facing charges of Violation of 21:843B, Use of Communications Facility & Controlled substance distribution received only three years probation!

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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