DEFENDING RICO CASES:
ACTUALLY, YOU *CAN* WIN THEM

John H. Cunha, Jr.

NOTES

Note: A CD of supporting materials, including sample motions, litigation manual excerpts, and law review and other articles, is available upon request by emailing Fran Pratt at Fran_Pratt@fd.org

Racketeer Influenced & Corrupt Organizations 18 U.S.C. § 1962

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The Statute
18 U.S.C. § 1962

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NOT Specifically Discussing

- Using racketeering income to acquire an interest in, or invest in, any enterprise
  – 18 U.S.C. § 1962 (a)
- Using racketeering activity to acquire an interest in any enterprise
  – 18 U.S.C. § 1962 (b)
- VICAR – committing violent crimes "for the purpose of gaining entrance to or maintaining or increasing position in a racketeering enterprise
  – 18 U.S.C. § 1959 (a)
- Criminal street gangs
  – 18 U.S.C. § 521

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RICO § 1962(c) Elements

1. An enterprise
2. The enterprise engaged, or its activities affected, interstate or foreign commerce
3. Your client associated with the enterprise
4. Your client knowingly and intentionally entered into an agreement to conduct, or participate in the conduct of, or the affairs of the enterprise through a pattern of racketeering activity

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Attack the Core

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Attack the Core – Primary

A. Not an enterprise

B. Client not a member or associate of the enterprise
   - Client's acts not in furtherance of the enterprise
     - *E.g.*, isolated buyer and seller
     - Individual street corner merchants
   - No continuity of predicate/criminal acts
   - Mere presence or association
     - *E.g.*, gang membership *per se* is not a crime
   - They've got the wrong guy

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Attack the Core – Secondary

C. No pattern of racketeering activity
- Client acts not related to, or in furtherance of, the enterprise
  - *E.g.*, isolated buyer and seller
  - Individual street corner merchants
- Mere presence or association
  - *E.g.*, gang membership *per se* is not a crime

D. Legal/factual
- Withdrawal
- Multiple conspiracies proved, but single conspiracy alleged in indictment – variance between indictment and proof
- Statute of Limitations
- Did not effect Interstate Commerce

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2. Interstate Commerce

- Activities must affect interstate or foreign commerce
- Government "expert" witness will testify
  - Cocaine = Columbia
  - Methamphetamine = Mexico
  - Guns/Ammunition = cross state lines
- *Is there no defense to this element?*

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Local Violence Only?

- *United States v. Lopez*, 514 U.S. 549 (1995)
  - 18 U.S.C. § 922(q)(1)(A), the Gun-Free School Zones Act of 1990 exceeded Congress' power to legislate under the Commerce Clause
- *United States v. Morrison*, 529 U.S. 598 (2000)
  - Civil remedies for the victims of gender-motivated violence did not involve economic activity or interstate commerce, and was therefore beyond the scope of Congress' powers under the Commerce Clause
- *Jones v. United States*, 529 U.S. 848 (2000)
  - Fire-bombed, owner occupied residence with no commercial purpose is not "used in" commerce or commerce-affecting activity
- *See the materials*: five law review articles on the jurisdictional limits of the Commerce Clause, several specifically directed at street gang prosecutions

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3. Perhaps A Criminal, *but* Not a Member or Associate

- There must be some connection between the defendant's predicate acts and the enterprise.
  - *See, e.g.*, *United States v. Marino*, 277 F. 3d 11 (1st Cir. 2002)
- The defendant was able to commit the predicate acts by means of, by consequence of, by reason of, by the agency of, or by the instrumentality of his association with the enterprise. *Id.*

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Mere Crime Is Not Enough

- Evidence is required that "the resources, property, or facilities of the enterprise" were used to facilitate the individual crimes, *e.g.*, distribution of drugs
  - *See, e.g., Marino*, 277 F.3d at 27-28
- Move to Sever – evidence of crimes unrelated to the alleged enterprise. *See* materials
- No go? Move *in limine* to exclude the evidence
  - Relevancy – Rules 401 & 402
  - More prejudicial than probative – Rule 403
  - Prior bad acts – Rule 404(b)
- *See the materials* – multiple motions to exclude evidence

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Withdrawal or OG?

- "[Withdrawal] typically requires evidence that the accused confessed his involvement in the conspiracy to the government or announced his withdrawal to his coconspirators."
  - *U.S. v. George*, 761 F.3d 42 (1st Cir. 2014)
- Mere cessation of activity on behalf of the conspiracy is not enough to show withdrawal
  - Avoiding contact with coconspirators, without more, is not tantamount to abandoning the conspiracy
  - Skipping meetings and refusing to answer calls from cooperating witnesses and coconspirators 'constitute inaction rather than affirmative steps to distance himself from his prior involvement.' *Id*. (citations omitted)
- Old Gangster no longer a member of or associated with?
- *See the materials* - Cecelia M. Harper, *How Do I Divorce My Gang?: Modifying the Defense of Withdrawal for a Gang-Related Conspiracy*, 50 Val. U. L. Rev. 765 (2016). http://scholar.valpo.edu/vulr/vol50/iss3/8

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1. An Enterprise?

- Includes any individual, partnership, corporation, association in fact, or other legal entity, and any union *or* group of individuals associated in fact although not a legal entity

  United States v. Turkette, 452 U.S. 576 (1981)

- An ongoing organization with associates, that functions "as a continuous unit."

  United States vs. Connolly, 341 F.3d 16, 25 (1st Cir. 2003) (*citing Turkette*, 452 U.S. at 583)

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Structure of an Enterprise – *Turkette*

- Name or geographic location?
- Identifiable colors, signs, or other insignia?
- Training sessions and meetings when making important decisions?
- A common purpose or goal beyond the isolated benefit gained from committing each criminal act?
- The degree to which members share resources and revenues?
- A "sense of membership?"
- Are individual criminal acts coordinated, does each further a general scheme or goal, and are they committed using a single consistent method?
- Consistent participation by the central figures?

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4. A Pattern of Racketeering Activity – 18 U.S.C. § 1961(5)

- At least two acts of racketeering activity
- The last of which occurred within 10 years after the commission of a prior act of racketeering activity
  - Excluding any period of imprisonment

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Racketeering Activity – 18 U.S.C. § 1961 (1)

- (A) any act or threat involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene matter, or dealing in a controlled substance . . . which is chargeable under State law and punishable by imprisonment for more than one year;
- (B) any act which is indictable under Title 18
- – In short, pretty much any crime of consequence

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Is There a Pattern?

- Proof of two predicate acts alone is insufficient to establish a pattern
- Instead, the predicate acts must prove the *threat of continuous [illegal] activity* and *relationship*
  - *Sedima, S.P.R.L. v. Imrex Co., Inc.*, 473 U.S. 479, 496 n. 14 (1985)
  - *H.J. Inc. v. Northwestern Bell Tel. Co.*, 492 U.S. 229 (1989)(relationship is to each act or to an organizing principle)
- *See* Corey P. Argust, *Racketeer Influenced and Corrupt Organizations,* 47 Am. Crim. L. Rev. 961, 967-968 (2010)

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Enterprise *vis a vis* Pattern of Racketeering Activity (In Theory)

"The 'enterprise' is not the pattern of racketeering activity; it is an entity separate and apart from the pattern of activity from which it engages. The existence of an 'enterprise' at all times remains a separate element which must be proved by the Government."

Turkette, 452 U.S. at 583

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Turkette vis a vis Association-In-Fact Enterprises

- Edmund Boyle robbed banks
  - With a loosely organized core group
  - Some robbers came and went
  - The group did not have a leader, a hierarchy, or a long-term plan
  - For each robbery, the group "met beforehand to plan the crime, gather tools . . . and assign the roles that each participant would play . . . ."
- Boyle requested a jury instruction requiring the prosecution to prove
  - By distinct evidence
  - That the group was an enterprise with a formal structure that could be defined separately and apart from the acts it committed

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Enterprise Structure *vis a vis* A Pattern of Racketeering Activity?

- Boyle was convicted of RICO and substantive crimes. 2nd Circuit affirmed.
- Petition for Certiorari - issue presented:
  - Whether an association-in-fact enterprise must have
  - "An ascertainable structure beyond that inherent in the pattern of racketeering activity in which it engages."
- Stated plainly, is there a distinction between an enterprise and the pattern of racketeering activity?
- The Court answered three questions

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Structural Element – 1st Question

- HELD: An association-in-fact enterprise "must have at least three structural features: a purpose, relationships among those associated with the enterprise, and longevity sufficient to permit these associates to pursue the enterprise's purpose."
- The Court facially reiterated the *Turkette* holding:
  - The existence of an enterprise and the pattern are distinct elements
  - *BUT*, the evidence used to prove these elements "may in particular cases coalesce"

Boyle v. United States, 556 U.S. 938 (2009)

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Must the Structure Be Ascertainable? – 2nd Question

- Since a jury must find the existence of elements of the crime beyond a reasonable doubt, requiring a jury to find the existence of a *structure* that is *ascertainable* would be redundant and potentially misleading.
- *Ergo*, no such jury instruction is required
  - *Boyle v. United States*, 556 U.S. 938 (2009)
- We are a *long way* from a statute directed against the Mafia

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Structure *"In a Particular Case"* May Be Inherent in the Pattern of Racketeering Activity – 3rd Question

- The enterprise's *purpose* may be carried out "on an ad hoc basis" and without hierarchical decision-making
- While an enterprise requires an *association among its members*, they "need not have fixed roles; different members may perform different roles at different times"
- Although *longevity* is required, "nothing in RICO exempts an enterprise whose associates engage in spurts of activity punctuated by periods of quiescence"
- Ergo, "proof of a pattern of racketeering activity may be sufficient *in a particular case* to permit a jury to infer the existence of an association-in-fact enterprise" (emphasis added)

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Association-In-Fact Enterprises *Turkette*? (In Practice)

- Without overturning *Turkette*, the Court held that an association-in-fact RICO enterprise is simply "a continuing unit that functions with a common purpose." *Boyle*, 129 S. Ct. at 2245
- A RICO enterprise does not require a hierarchy, a chain of command, fixed roles, regular meetings, or rules and regulations. *Id*.
  - *But*, these *Turkette*-derived questions are still relevant
  - *i.e.,* is there a *purpose*, relationships among the associated, & *longevity/continuity* sufficient to permit finding there is an association-in-fact enterprise?
- How Does One Operate Or Manage An Enterprise? Insights From *Boyle v. United States,* Michael Levi Thomas, N.Y.U. Law Review, 87-1 (2012)

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RICO Conspiracy

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RICO Conspiracy – 18 U.S.C. § 1962 (d)

- Unlawful to conspire to violate any provision of §§ (a), (b), or (c)
- RICO Conspiracy *vis a vis* § 1962(c):
  - Agreement <u>*any*</u> conspirator would commit at least ***two*** acts of racketeering in conduct of enterprise affairs
- <u>No</u> overt act required

  Salinas v. United States, 522 U.S. 52 (1997)

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How to Defend A Conspiracy?

- Topic onto itself
- But, some specific points . . .

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Mere Association or Similarity of Conduct

- Association with co-conspirators, similar conduct, or mere presence with co-conspirators is alone *not* enough to establish membership in a conspiracy
- The focus is on the individual, not the group
- *See, e.g., U.S. v. Rose*, 104 F.3d 1408, 1416 (1st Cir. 1997)

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An Agreement or a Club?

- "[P]roblems . . . may arise when courts mistakenly deal with the crime of conspiracy as though it were a group rather than an act [i.e. of agreement]."
  - *US v. Montserrate-Valentine*, 729 F.2d 31, 43 (1st Cir. 2013) (citations, quotations omitted)
- "Conspiracy law, like most criminal law, focuses upon the activities of an individual defendant. It is therefore dangerous to think of a conspiracy as a kind of 'club' that one joins or a 'business' in which one works." *Id*.
- The "gist of the conspiracy offense remains the agreement, and it is therefore essential to examine what kind of agreement or understanding existed *as to each defendant*." *Id*. (emphasis in original)

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Is There An Agreement?

- Cannot conspire with a government agent or cooperating witness after the witness becomes an informant
  - *US v. Paladin*, 748 F.3d 438, 449 n. 8 (1st Cir. 2014)
- Drug seller does not conspire with drug buyer unless they share common purpose that buyer re-distribute. Proof of redistribution by itself not enough
  - *US v. Boidi*, 568 F.3d 24, 30 (1st Cir. 2009)

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Potential Defense: One – or More – Conspiracies?

- Does the evidence establish the existence of a single conspiracy with multiple criminal objectives, or separate "spoke" conspiracies?
  - Can the government prove that your client joined a larger, multiple objective conspiracy?
  - What acts were in furtherance of the RICO conspiracy – AND, which were not?
- *Bruton* issues where statements not in furtherance of the substantive RICO or conspiracy charged

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Attack the Edges

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Knowledge of the Conspiracy

- "With respect to the second element, the Government must establish that the defendant had knowledge *of the crime charged* . . . Showing that the defendant had knowledge of generalized illegality is insufficient . . . [T]he Government must show that the defendant knew the conspiracy involved a controlled substance, but need not show that the defendant knew the *specific* controlled substance being distributed." *U.S. v. Burgos*, 703 F.3d 1, 10 (1st Cir. 2012)
- Government may satisfy this element by evidence of actual knowledge *or* willful blindness. *Id*.

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Pinkerton Liability

When the government proves that a defendant has joined a conspiracy, that defendant becomes vicariously liable for the substantive crimes his co-conspirators commit

- Were the acts in furtherance of the conspiracy?
- Could your client reasonably have foreseen that a co-conspirator might commit the crime?

Pinkerton v. United States, 328 U.S. 640 (1946)

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Co-Conspirator Statements Rule 801(d)(2)(E)

- Rule 801 Exclusions from Hearsay
  - **(d) Statements That Are Not Hearsay.** A statement that meets the following conditions is not hearsay:
  - **(2) *An Opposing Party's Statement*.** The statement is offered against an opposing party and:
  - **(E)** was made by the party's coconspirator during and in furtherance of the conspiracy. The statement must be considered but does not by itself establish . . . the existence or scope of the relationship under (D); or the existence of the conspiracy or participation in it under (E).

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Co-Conspirator Statements

- "The declarants' statements alone cannot satisfy the preponderance of the evidence standard; there must be some independent corroboration to allow admission."
  - *U.S. v. Diaz*, 670 F.3d 332 (1st Cir. 2010)

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When Must the Court Make the Finding?

Upon objection, the co-conspirator declaration may be conditionally admitted, and the court should inform the parties on the record out of the hearing of the jury that

(a) the prosecution will be required to prove by a preponderance of the evidence that a conspiracy existed, that the declarant and defendant were members of it at the time that the declaration was made, and that the declaration was in furtherance of the conspiracy,

(b) at the close of all the evidence the court will make a final *Petrozziello* determination for the record, out of the hearing of the jury; and,

(c) if the determination is against admitting the declaration, the court will give a cautionary instruction to the jury, or, upon an appropriate motion, declare a mistrial if the instruction will not suffice to cure any prejudice.

U.S. v. Ciampaglia, 628 F. 2d 632, 638 (1st Cir. 1980)

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When Must the Court Make the Finding?

- "Rare" instances when a pretrial hearing is warranted, *but*
  - "Although there might conceivably be instances where such a hearing would be helpful, we think that as a general rule such a hearing, unlike a pretrial suppression hearing, would unnecessarily lengthen the proceedings. Evidentiary questions are grist for the mill of district judges and, except in rare instances, can be handled competently in the trial context. In any event, this is a matter solely within the discretion of the district court. The district court did not abuse its discretion in refusing to hold a pretrial hearing on the admissibility of coconspirators' statements . . . the record shows that such a hearing would have been a total waste of time and effort." *U.S. v. Medina*, 761 F.2d 12, 17 (1st Cir. 1985)
- Ask the Court to require the government to make a proffer
  - *See United States v. MacKenzie,* 01-Crim-10350-DPW (D. Mass. Nov. 20, 2003)
- *See materials* - Defendants' Motion For An Advance Proffer, Hearing, And Ruling On The Admissibility Of Statements And Conduct By Alleged Co-Conspirators

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Unindicted Co-Conspirators

- DOJ policy forbids disclosing their identities in indictments
- Find out who they are
- Local Rules may require identification
  - *See, e.g.,* Local Rule 116.1(c)(1)(E), Dist. of Mass.
- If there are none and arguable co-conspirators testify
  - What does that say about your client's culpability?

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Co-Conspirator Statements

- Request a pretrial hearing on the admissibility of any co-conspirator statements which may be outside the conspiracy's scope or excludable under Fed. R. Evid. 403
  - *See materials* - Motion To Exclude Post-Contaminated Shipment - Recall Efforts
- Request a pretrial hearing to determine if the government can prove a conspiracy exists and that the alleged co-conspirator statements are admissible
- Request limiting instruction for impeachment purposes. *United States v. Sauza-Martinez* , 217 F.3d 754, 759-760 (9th Cir. 2000)

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Confrontation Right May Bar Hearsay Exceptions

- One brother & two other men indicted after implicated by the rat brother, who said he was only drinking during a two-day crime spree (murder, robbery, etc.)
- Rat brother then claimed 5th at the trial of the other 3
- Rat brother's statement admitted by AUSA against the other 3 as a statement against rat brother's interest
- Constitutional right to confrontation can call into question co-defendant statements and co-conspirator statements offered under other exceptions (*e.g.*, against penal interests or residual trustworthiness)

Lilly v. Virginia, 527 U.S. 116 (1999)

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Impeaching Co-Conspirators – Fed. R. Evid. Rule 806

- When the government offers a statement by a co-conspirator in furtherance of the conspiracy against your client, you can:
  - Impeach the co-conspirator by introducing any prior convictions, you could use against him under Fed. R. Evid. 609 as if he were there on the stand
  - Impeach the co-conspirator by offering evidence, on cross-examination of testifying agents, *e.g.*, that the co-conspirator said something inconsistent with the offered statement, either before or after making it
  - Cross-examine the testifying agent about the co-conspirator's bias, *e.g.*, pending charges at the time of the statement
- Be wary of divide and conquer – seek severance if a co-defendant intends to use Rule 806 to offer otherwise inadmissible evidence (*e.g.*, prior convictions) against your client

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Maximum Sentence – 18 U.S.C. § 1963

- 20 years
  - *Or* life, if the violation is based on racketeering activity for which the maximum penalty is life
- If your client has murder predicate(s):
  - Attacking it may be the only defense
  - When is 22 years a win?

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Murder Predicates – But Not Your Client

- Move to Sever – Fed. R. Crim. P. 14(a)
  - Prejudicial Joinder "Spillover Effect"
  - Judicial Economy
  - Jury Confusion
- Move to Preclude Evidence of the Murders
  - More prejudicial than probative – Fed. R. Evid. 403
  - Jury confusion
  - Relevancy – Fed. R. Evid. 401
- *See* the materials – motions, memos & Order to sever from murder defendants in three different RICO cases.

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RICO/Gang “Experts”

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Indicia of Gang Association?

- Colors
- Clothing, *e.g.:*
  - Type of hat, athletic shirt
  - Tilt of clothing or jewelry to one side or the other
  - Bandannas or scarves hanging from belt loops, pockets, or tied to the leg
  - Eyebrows shaved or lines shaved through them
  - Burn marks (brands) on the arms, hands, or chest
  - Writing on the inside of hat, or under the brims for gang writing
- Tattoos
  - Explicit gang identification
  - Tattoos on the inside of the hand or between the thumb or index finger
- Google – client, gang and/or clique
  - *E.g.*, https://en.wikipedia.org/wiki/List_of_gangs_in_the_United_States
- Social media
  - Facebook, etc.
  - YouTube

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Sez Who? Government Gang "Expert"

- Cop dressed-up to be an EXPERT
- The lead investigator
  - Often the lead in the wiretap investigation
  - Don't open the door on cross
  - *See materials* - Motion Exclude Case-Agent Testimony Regarding Investigation
- A gang member
  - A snitch
  - Cooperating former co-D
- Academician
- *RICO to Prosecute Gangs*, Leeza Cherniak

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United States v. Mejia, 545 F.3d 179 (2d Cir. 2008)

MS-13 gang convictions reversed due to erroneous law enforcement "expert" testimony, including:

- Inadmissible testimony on factual matters;
- Merely repeating hearsay statements without using expertise to reach an opinion; and
- Repeating and summarizing the testimonial statements of others, which violated the Confrontation Clause

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Bad Sources = Bad Opinions

- Gang "experts" are not scientists
- Heavy reliance on snitches
- Seek discovery of sources
- Entitled to impeach hearsay declarants – seek discovery (most importantly of informants trading info for freedom)
- Pretrial *Crawford* challenge
- Pretrial *Daubert* challenge
- *See the materials* – Motion To Compel Expert Witness Disclosures

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Gang Expert – Source Discovery

- All reports reviewed by *expert* and by *other task force members*
- All transcripts of expert and members of the team
- All records relating to formal training
- Gang lists
- Reports, publications, classes
- Gang validation criteria and memoranda
  - Gang validation reports re: client and re: gang
- Other documents relied upon to establish existence of gang
- Other documents relied upon to establish membership of client
  - *E.g.*, self-admission/jail intake
- Documents relied upon to establish pattern of conduct & predicate acts
- Documents establishing activity and organization of gang
  - *E.g.*, police reports, FIO, self-admission

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Gang Expert – Admissibility

- Foundation
- *Crawford v. Washington*, 541 U.S. 36 (2004) – confrontation right
- *Daubert v. Merrill Dow Pharmaceuticals, Inc*., 509 U.S. 579 (1993) ("charges the [trial] court with assuring that expert testimony 'rests on a reliable foundation and is relevant to the task at hand'")
- *General Electric Co. v. Joiner*, 522 U.S. 136 (1997)
- *Kumho Tire Co. Ltd. v. Carmichael,* 526 U.S. 137 (1999)
- *See the materials* - Sabelli & Chorney, *Gang Expert Testimony and the Applicability of Crawford*

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Challenge Expertise – Pretrial & Trial

- Bias – only testifies for the government?
- Training – what is the *claimed* area of expertise
  - If formal, from where?
  - OTJ from other cops?
  - Peer review?
- Educational background? Organizations?
- Articles – What does s/he read? Write? Rely upon?
- What does the gang "expert" rely upon to formulate opinion that:
  - A gang/enterprise exists?
  - Meaning (translation) of gang signs , nicknames or lingo?
  - Your client is a member?

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Defense Expert – Is It A Gang/Enterprise?

- Former Cop
- Community activists
- Journalists
- Workers at local centers
- Rehab counsellors?

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Toxic Rule 1006 Exhibits

- When the Government's charts are not proper summaries of the evidence under Rule 1006, but rather, "pedagogical devices that unfairly emphasize part of the proponent's proof or create the impression that disputed facts have been conclusively established or that inferences have been directly proved."
- *See, e.g., United States v. Drougas*, 748 F.2d 8, 25 (1st Cir. 1984).
- *See the materials* - Motion To Exclude Improper Summary Exhibits

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Essential Joint Strategies

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"We must all hang together or assuredly we shall all hang separately."

- We each represents only our own client, *but*
- *Cannot* let the government divide & conquer
- Imperative to be together
- E-mail list with all counsel
- Regular defense meetings *with* agendas
- Divvy up primary responsibility for witnesses

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Joint Defense Cooperation

- Joint Defense Agreement?
  - *See the materials* - Miriam Conrad, *Ethical Issues in Representing Clients in a Multi-Defendant Case*
- Coordinating Discovery Attorney (CDA)
- Online database programs – seek funds
- Paralegal funding and organization
- Investigator appointed and funded
- Expert(s)
- *See materials* - Joint Application For Daily Transcripts

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Seek Early Disclosure

- Jencks materials
- Witness list
- Experts and expert opinions
- Defendant's & co-defendants' statements
  - Request production under Rule 14(b) (prejudicial joinder)
  - Statements may need to be excluded, sanitized, etc.
  - To avoid *Bruton* issues in context of RICO *Pinkerton* liability
- Local Rules?
- Due process & right to a defense
  - Insufficient time to fully prepare a complex case
- Stress cost, judicial and trial economy
  - Need for in-trial continuances
  - CJA costs

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Jury Considerations

- Jury voir dire questionnaires
- Jury consultants
- Number of peremptory challenges
  - Team effort needed
  - Joint defense meetings/planning
- Special verdict slips
- Lesser included offenses?
  - *E.g.*, murder or manslaughter?

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National Litigation Support FD.ORG

- CJA Resources – Saturday Plenary, 8:45 a.m.
- Litigation Support Section
- National Litigation Support Team
- CJA Panel Attorney Software Discounts
- Coordinating Discovery Attorneys (CDAs)
- Joint DOJ/Administrative Office of U.S. Courts
  - Electronically Stored Information (ESI) Protocols
- Criminal E-Discovery Pocket Guide for Judges

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DOJ Prosecution Manuals – In the materials

- Criminal RICO: 18 U.S.C. §§ 1961-1968 – A Manual For Federal Prosecutors (6th Rev. Ed., May 2016)
- Violent Crimes in Aid of Racketeering 18 U.S.C. § 1959 – A Manual for Federal Prosecutors (December 2006)

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– Attack the Core –
– Attack the Edges –
– Joint Defense –

Good Hunting!

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