UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

Appeal No. 02-3971

UNITED STATES OF AMERICA

Plaintiff-Appellee,

v.

JAMES E. JOHNSON,

Defendant-Appellant,

**Appeal From the Final Judgment of Conviction
Entered In The United States District Court
For The Eastern District of Wisconsin,
Honorable Charles N. Clevert, Presiding**

**BRIEF AND APPENDIX
OF DEFENDANT-APPELLANT
JAMES E. JOHNSON**

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IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT

Appeal No. 02-3971

UNITED STATES OF AMERICA

Plaintiff-Appellee,

v.

JAMES E. JOHNSON,

Defendant-Appellant,

BRIEF OF DEFENDANT-APPELLANT
JAMES E. JOHNSON

JURISDICTIONAL STATEMENT

James E. Johnson, appeals from the final resentencing judgement of conviction and sentence in this criminal case entered by the district court on October 28, 2002. The district court had jurisdiction under 28 U.S.C. §3231. The district court had jurisdiction to resentence Johnson based on its order of August 27, 2002, granting Johnson's petition to vacate his original sentence under 28 U.S.C. §2255. The Court of Appeals has jurisdiction to hear this appeal under 18 U.S.C. §3742(a) and 28 U.S.C. §1291.

Johnson filed his notice of appeal and docketing statement with the district

court on November 6, 2002 (R393; R394),[1] and filed amended copies of those documents correcting an error in the caption on November 8, 2002 (R396; R397).

There are no motions for a new trial or alteration of the judgment, or any other motion which would toll the time in which to appeal pursuant to Fed. R. App. P. 4(b)(3).

There were prior federal appellate proceedings in this case. Specifically, Mr. Johnson previously appealed his original conviction and sentence in this matter, which appeal resulted in affirmance by the Court of Appeals in a decision dated January 13, 2000. *United States v. James E. Johnson,* 200 F.3d 529, 531-32 (7th Cir. 2000) (Appeal No. 99-1414).

Also, due to a filing error, this appeal originally was filed under two separate appeal numbers. The redundant case was dismissed by Order dated November 25, 2002. *United States v. James E. Johnson*, Appeal No. 02-3994.

STATEMENT OF ISSUE PRESENTED FOR REVIEW

Whether the sentence was imposed in violation of law on the grounds that facts necessary to increase the sentencing range available under the Federal Sentencing Guidelines were not found by the jury beyond a reasonable doubt.

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[1] Throughout this brief, several abbreviations are used pursuant to Fed. R. App. P. 28(e). Documents in the record are identified by the District Court docket sheet number as "R___"; the following ":___" reference denotes the page number of the document. References to documents which are not docketed or separately paginated (such as those sealed by the district court following sentencing) are to the document by name. When the document is reproduced in the attached appendix, the applicable appendix page number is also identified as "App. ___."

STATEMENT OF THE CASE AND OF THE FACTS

On November 18, 1997, the government filed a multi-count indictment against James E. Johnson and five others alleging various drug offenses. Johnson was charged in but a single count, Count I, alleging conspiracy to distribute more than five kilograms of cocaine. (R11).

After various pretrial proceedings, Johnson's jury trial began on October 19, 1998, concluding on October 28, 1998 with a verdict of guilty on the charge of conspiracy (R233; R238). The jury made no findings as to the quantity of cocaine attributable to Johnson, having been instructed that it need find "only that a measurable amount of cocaine was in fact the subject of the acts charged in the indictment." (R273:718-19; App. 54-55).

In its decision on the appeal from Johnson's conviction and original sentence, the Court summarized the trial evidence and subsequent proceedings as follows:

> The prosecution's primary witness at Johnson's trial was Michael Blake, one of Johnson's associates and drug suppliers who had agreed to cooperate with the authorities. Blake testified that he began distributing cocaine in the Milwaukee, Wisconsin area around 1979. He met Johnson around that time through Johnson's brother, Charles, and began distributing drugs to James Johnson. Blake's drug distribution was periodically interrupted by short stints in prison, but when he was released in 1995, a former prison buddy-- Candelario Nevarez-Diaz--contacted him and proposed a cocaine dealing venture. Nevarez-Diaz agreed to front the cocaine, meaning Blake would pay for it only after he had sold it to others. That very night, Nevarez-Diaz fronted Blake 125 grams of cocaine, which Blake in turn fronted to Johnson and another individual, Gordon Hagenkord. Blake and Hagenkord also fronted cocaine to Robert Schultz and his stepdaughter

Colleen Hanson, who sold it out of Shultz's Milwaukee bar, the Blue Ribbon Pub.

The sales continued and increased to a point where in early 1996, Nevarez-Diaz was supplying Blake with one kilogram of cocaine every two months. Blake, in turn, delivered some of the cocaine to Johnson's home in Milwaukee. Blake testified that in 1996, he delivered up to two kilograms of cocaine to Johnson at any one time, and Johnson paid him $28,000 for each kilogram. By this time, Blake was working closely with Nevarez-Diaz and even used Nevarez-Diaz's money to purchase a Chevrolet Lumina to transport drugs from Arizona. In 1997, Nevarez-Diaz supplied Blake with around 5 to 10 kilograms of cocaine every ten to twelve days, for which Blake paid him $22,000 per kilogram. Blake, in turn, supplied Johnson with between 3 and 4 kilograms of cocaine every ten to twelve days, and sold it on credit for about $27,000 per kilogram. Blake estimated that between January 1, 1996 and July 24, 1997 he supplied Johnson with between 35 and 45 kilograms of cocaine.

On July 24, 1997, the police finally caught up with Blake when they pulled his car over for a traffic violation. A search of his vehicle turned up cocaine and around $120,000, some of which Johnson had given to Blake for cocaine. Charged with possession of cocaine and facing a long stretch in prison, Blake decided to cooperate with the government. With the assistance of the police, he placed recorded telephone calls to Nevarez-Diaz, Johnson, and Hagenkord. Audio tapes of Blake's four conversations with Johnson were admitted into evidence and played for the jury. The recorded conversations were consistent with Blake's testimony that he fronted cocaine to Johnson and that Johnson was a willing participant in the conspiracy.

Johnson testified at his trial, and although he admitted that he used cocaine, he denied that he ever was involved in a drug conspiracy. Rather, Johnson stated that he and Blake sold seafood products. According to Johnson, Blake would drop off shrimp, which Johnson would peddle on the street and for which he would pay Blake some of the proceeds. Apparently the jury did not believe him, as it convicted him of one count of conspiracy with intent to distribute and possession with the intent to distribute cocaine, in violation of 21 U.S.C. § 841(a)(1). With an offense level of 37 and a criminal history category of VI, Johnson was sentenced to 360 months of imprisonment, the

shortest sentence permitted under the Guidelines.

United States v. James E. Johnson, 200 F.3d 529, 531-32 (7th Cir. 2000) (footnote omitted).

Johnson appealed but, by decision dated January 13, 2000, this Court affirmed his conviction and sentence. *Id.*

On January 12, 2001, Mr. Johnson filed a petition pursuant to 28 U.S.C. §2255, seeking vacation of his sentence on the grounds, *inter alia*, that a prior state drug conviction had been vacated and dismissed (R343). Because use of that conviction had resulted in a finding that Johnson was a "career offender" under the Federal Sentencing Guidelines, with the consequent enhancement of both his offense level and his criminal history category, the District Court granted the petition on August 27, 2002, and, without objection from the Government, ordered resentencing (R387; *see* R385).

At the resentencing on October 18, 2002, the District Court adopted the presentence author's calculations of the offense level (34, based upon Johnson's alleged involvement in between 15 and 50 kilograms of cocaine), criminal history category of IV, and ultimate sentencing range of 210 to 262 months (R404:25-26; App. 33-34; *see* Second Addendum to Presentence Report). Although defense counsel objected that the sentencing range should be based upon an offense level of 12 given the decision in *Apprendi v. New Jersey*, 530 U.S. 466 (2000), and the

absence of any instruction or jury finding of the quantity of cocaine attributable to Johnson, he acknowledged that this Court has held to the contrary and that the District Court was bound by those decisions (R404:5-6; App. 13-14). The District Court ultimately concluded that *Apprendi* did not apply (R404:25; App. 33). [2]

Te District Court then imposed a sentence at what it viewed as the low end of the applicable sentencing range: 210 months, or 17½ years, imprisonment and 5 years supervised release (R404:25-31; App. 33-39). The Court entered judgment on October 28, 2002 (R392; App. 1-8).

Johnson timely filed his notice of appeal on November 6, 2002 (R393), and, upon subsequently discovering an error in the caption, counsel filed an amended notice of appeal on November 8, 2002 (R396). The two notices, however, were misconstrued and resulted in the opening of two separate appeals before this Court, Appeal Nos. 02-3971 & 02-3994. Following Johnson's Motion to Consolidate or Dismiss Redundant Appeal, this Court on November 25, 2002, ordered Appeal No. 02-3994 dismissed and the filings in that matter transferred to the current appeal.

SUMMARY OF ARGUMENT

In *Apprendi v. New Jersey*, 530 U.S. 466, 490 (2000), the Supreme Court squarely held that "[o]ther than the fact of a prior conviction, any fact that increases

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[2] Although not directly relevant here, the District Court also overruled Johnson's objection that, given the absence of an instruction requiring the jury to find the quantity of cocaine attributable to him, the applicable statutory maximum prison term was that of the default offense or 20 years (R404:3-14, 25; App. 11-22, 33). Because the sentence imposed was less than 20 years, however, the District Court properly held that the argument was "academic." (R404:13-14; App. 21-22)

the penalty for a crime beyond the prescribed statutory maximum must be submitted to a jury, and proved beyond a reasonable doubt." The jury here was not instructed to find any particular quantity of cocaine to be attributable to Mr. Johnson, and it accordingly made no such determination. Mr. Johnson submits that, under the logic of the Court's decision in *Apprendi*, as reinforced by *Ring v. Arizona*, 122 S.Ct. 2428 (2002), his sentence was unlawful because it exceeded the Sentencing Guidelines imprisonment range authorized by the verdict in this case.

Mr. Johnson acknowledges that panel decisions of this Court have held to the contrary. However, those decisions have not taken into account the recent decision in *Ring*.

ARGUMENT

ABSENT A JURY FINDING OF QUANTITY, THE DISTRICT COURT'S ENHANCEMENT OF JOHNSON'S SENTENCE UNDER THE FEDERAL SENTENCING GUIDELINES VIOLATED THE CONSTITUTIONAL PRINCIPLES UNDERLYING *APPRENDI v. NEW JERSEY*, 530 U.S. 466 (2000)

Mr. Johnson was charged with conspiracy to distribute more than five kilograms of cocaine (R11). The jury, however, was not instructed that quantity was a necessary element of the offense which it must find, if at all, beyond a reasonable doubt. Rather, it was instructed that "[t]he evidence in the case need not establish that the amount or quantity of cocaine was as alleged in the indictment, but only that a measurable amount of cocaine was in fact the subject of the acts charged in the

indictment." (R273:718-19; App. 54-55).

Despite the absence of a jury verdict beyond a reasonable doubt finding Johnson's involvement in anything beyond "a measurable amount of cocaine," the District Court resentenced him pursuant to a sentencing range calculated under the Federal Sentencing Guidelines based upon a finding that he was involved in between 15 and 50 kilograms of cocaine. Based upon the District Court's own factual findings, it calculated Johnson's Guidelines sentencing range at 210 to 262 months (R404:25; App. 33). This range was calculated based on an offense level of 34, U.S.S.G. §2D1.1(c)(3) (offense level for involvement with 15 to 50 kg of cocaine is 34), and a criminal history category IV. (*See* Second Addendum to Presentence Report).

While recognizing that this Court has held to the contrary, Mr. Johnson respectfully submits that the sentence violated his rights to due process and to a jury trial under the principles underlying *Apprendi v. New Jersey*, 530 U.S. 466 (2000), and *Ring v. Arizona*, 122 S.Ct. 2428 (2002). Had Johnson's Guidelines been calculated based on the jury's finding of "a measurable amount of cocaine," his base offense level would have been 12, U.S.S.G. §2D1.1(c)(14) (offense level for involvement with less than 25 grams of cocaine is 12). Combined with his criminal history category of IV, the applicable sentencing range would have been 21-27 months. U.S.S.G. ch.5, Part A (Sentencing Table).

A. Standard of Review

Pursuant to 18 U.S.C. §3742(a), this Court must review a sentence imposed under the Sentencing Guidelines to determine whether that sentence "was imposed in violation of law." *See also* 18 U.S.C. §3742(a) (listing the circumstances in which a defendant may seek review of an otherwise final sentence, including if the sentence was imposed "in violation of law" or as a result of an incorrect application of the guidelines). Absent dispute regarding the relevant facts, assessment of whether the sentence was imposed in violation of law is *de novo*. *E.g.*, *United States v. Guy*, 174 F.3d 859, 861 (7th Cir. 1999).

B. The Sentence Was Imposed in Violation of Law

The 17½ year sentence imposed in this case "was imposed in violation of law" as defined by the Supreme Court's decision in *Apprendi v. New Jersey*, 530 U.S. 466 (2000). The Court there held that "[o]ther than the fact of a prior conviction, any fact that increases the penalty for a crime beyond the prescribed statutory maximum must be submitted to a jury, and proved beyond a reasonable doubt." *Id.* at 490. Because the applicable sentencing ranges under U.S.S.G. §2D1.1 turn on the quantity of drugs which forms the basis of the charged conspiracy, *see* U.S.S.G. §2D1.1(a) & (c), enhancing the sentencing range without first submitting the question of quantity to the jury for a finding beyond a reasonable doubt violates the constitutional principles

in *Apprendi*.[3]

Johnson fully understands that this Court consistently has rejected the logic of this argument. *E.g.*, *United States v. Knox*, 301 F.3d 616, 619 (7th Cir. 2002) ("*Apprendi* is never relevant to guidelines calculations"); *Talbott v. Indiana*, 226 F.3d 866, 868 (7th Cir. 2000) ("*Apprendi* does not affect application of the relevant conduct rules under the Sentencing Guidelines to sentences that fall within a statutory cap").

Johnson respectfully submits that the Court erred in these cases. Especially after the Supreme Court's application of the rule of *Apprendi* in *Ring v. Arizona*, 122 S.Ct. 2428 (2002), facts raising the Guidelines maximum should be charged in an indictment and proved to, and found by, a jury beyond a reasonable doubt. The *Ring* Court, in deciding whether *Apprendi* applied to the statutory aggravating factors necessary to sentence a capital defendant to death, eschewed formal labels in favor of a functional approach, namely: whether the particular facts in question, if found by the factfinder, would result in a punishment that was otherwise unavailable.

In *Ring*, the State of Arizona argued that there was no *Apprendi* violation because the defendant was technically eligible for the death penalty once the jury found him guilty of a capital offense. The Court rejected this argument, however, because it noted that, despite the technical availability of the death penalty for the offense of conviction, the death penalty could not, in practice, be imposed absent a

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[3] Much of this argument originated with Assistant Federal Public Defender Timothy Crooks of Houston, Texas. Counsel appreciates the assistance and research provided by Mr. Crooks.

finding of one or more aggravating circumstances by a judge. *See Ring*, 122 S. Ct. at 2440-41. Quoting *Apprendi*, the Court held that "'the relevant inquiry is one not of form, but of effect," *id.* at 2440 (quoting *Apprendi*, 530 U.S. at 494), and noted that "[i]f Arizona prevailed on its opening argument, *Apprendi* would be reduced to a meaningless and formalistic rule of statutory drafting." *Ring*, *id.* at 2441 (citation omitted).

Especially under the functional approach of *Ring*, there is every reason to hold that the Guidelines are "laws" that prescribe the maximum authorized sentence within the meaning of *Apprendi*, even though those adjustments are not expressed as elements of the criminal offense.

Admittedly, the Guidelines do not originate as legislation, but are promulgated by a federal agency, the U.S. Sentencing Commission. *See* 28 U.S.C. §991. They are not mere agency regulations, however. The Commission is a part of the Judicial Branch. *See Mistretta v. United States*, 488 U.S. 361, 368 (1989). Its Guidelines do not merely regulate agency action; they apply to every federal court in the country. *See id.* at 367–68; *see also* 28 U.S.C. §994(a)(1). The Guidelines are submitted to Congress, and become the law unless Congress affirmatively modifies or disapproves them. *See* 28 U.S.C. §994(p). Compliance with the Guidelines is not optional. *See* 18 U.S.C. §3553(b) ("The court shall impose a sentence of the kind, and within the range," determined by the guidelines in effect at sentencing.). The only exception to this statutory requirement is if "the court finds that there exists an aggravating or

mitigating circumstance of a kind, or to a degree, not adequately taken into consideration by the Sentencing Commission in formulating the guidelines that should result in a sentence different from that described." *Id.* But even in making that determination, the court may consider "only the sentencing guidelines, policy statements, and official commentary of the Sentencing Commission." *Id.*

As Justice Scalia has noted, "[w]hile the products of the Sentencing Commission's labors have been given the modest name 'Guidelines,' . . . they have the force and effect of laws, prescribing the sentences criminal defendants are to receive." *Mistretta*, 488 U.S. at 413 (Scalia, J., dissenting) (citations omitted); *see also Apprendi*, 530 U.S. at 523 n.11 (Thomas, J., concurring) (quoting Justice Scalia's statement).[4] While Guidelines may not have the form of legislation, they function as legislative limits on sentencing power. Their force is clear from the fact that "[a] judge who disregards them will be reversed . . . ." *Mistretta*, 488 U.S. at 413 (Scalia, J., dissenting) (citing 18 U.S.C. § 3742).

That the Guidelines are effectively sentencing "laws" is also supported by the decision in *Miller v. Florida*, 482 U.S. 423 (1987). At issue in *Miller* was whether unfavorable amendments to Florida's state sentencing guidelines were subject to the constitutional proscription against *ex post facto* laws. The Florida scheme was remarkably similar to the Federal Sentencing Guidelines: guidelines became effective

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[4] Although the *Mistretta* majority did not agree with Justice Scalia's separation-of-powers reasoning, it did acknowledge that the Guidelines were legally binding on the courts. *See Mistretta*, 488 U.S. at 367.

upon legislation implementing them, and they required the judge to set sentence within the presumptive guideline range, absent a finding of clear reasons for departing. *See Miller*, 482 U.S. at 425–26. The Court found that the Florida guideline system "ha[d] the force and effect of law" and was subject to *ex post facto* prohibitions. *Id.* at 435. Following *Miller*, every federal court of appeals has held that the federal sentencing guidelines are "laws" for *ex post facto* purposes. *See, e.g.*, *United States v. Bell*, 991 F.2d 1445, 1447–48 & n.4 (8th Cir. 1993) (so holding and collecting cases from every circuit except the Seventh); *United States v. Seacott,* 15 F.3d 1380, 1386 (7th Cir. 1994).

In this regard, it is useful to note, as the Eighth Circuit did in *Bell*, that the district court's limited power to depart from the Guidelines "does not provide district courts with the degree of discretion necessary to prevent the Guidelines from being considered laws." *Bell*, 991 F.2d at 1450; *see also id.* at 1450-51. And, as the *Bell* court also noted, the fact that the Guidelines are "not approved by both houses of Congress in the ordinary sense" is irrelevant because "Congress cannot escape the Constitutional constraints on its power by delegating its lawmaking function to an agency." *Id.* at 1450.

Just as the Guidelines are "laws" subject to the proscriptions of the *Ex Post Facto* Clause, they are laws subject to the principles in *Apprendi*. Guideline enhancements effectively "increase the prescribed range of penalties to which a criminal defendant is exposed." *Apprendi*, 530 U.S. at 490. Guideline maximums

"are legally binding enactments" that function "in a manner nearly indistinguishable from congressionally enacted criminal statutes." *United States v. Kinter*, 235 F.3d 192, 200 (4th Cir. 2000), *cert. denied,* 532 U.S. 937 (2001). Because of their functional equivalence to other statutory limits, the Guideline enhancements must be viewed as setting the maximum prescribed sentence for purposes of the constitutional principle in *Apprendi*.

In a non-constitutional context, the Supreme Court has acknowledged that the Guidelines provide, in effect, a statutorily-prescribed maximum sentence. In *United States v. R.L.C.*, 503 U.S. 291 (1992), the Court construed the Federal Juvenile Delinquency Act, which limited a juvenile's detention to "the maximum term of imprisonment that would be authorized if the juvenile had been tried and convicted as an adult." *R.L.C.*, 503 U.S. at 294 (quoting 18 U.S.C. §5037(c)(1)(B)). The government argued that the "maximum term of imprisonment that would be authorized" referred to the maximum provided by the statute of conviction, rather than the guideline maximum. *See id.* at 297. The Court disagreed. It rejected "any suggestion that the statutory character of a specific penalty provision gives it primacy over administrative sentencing guidelines," on the grounds that "the mandate to apply the Guidelines is itself statutory." *Id.* (citing 18 U.S.C. §3553(b)).

Faced with what it considered competing statutory sentencing limits, the *R.L.C.* Court framed the question as "whether Congress intended the courts to treat the upper limit of [the statutory penalty] as 'authorized' even when proper application

of a statutorily mandated Guideline . . . would bar imposition up to the limit . . . ." *R.L.C.*, 503 U.S. at 297. Although it ultimately found it unnecessary to resolve the issue,[5] the Court opined that, under "the more natural construction," the "maximum term . . . authorized" must be determined by reference to all statutes that bear on the sentencing decision, "not only those that empower the court to sentence but those that limit the legitimacy of its exercise of that power." *R.L.C.*, 503 U.S. at 298.

This reasoning applies with equal force in the context of the *Apprendi* rule. While the Guidelines do not set the absolute limit on the court's power to sentence, they do "limit the legitimacy of its exercise of that power." *Id.* And, as *Ring* makes clear, limits on the exercise of sentencing power implicate *Apprendi*. Like the state murder statute at issue in *Ring*, federal criminal statutes authorize a maximum penalty "only in the formal sense." *Ring*, 122 S. Ct. at 2440 (quoting *Apprendi*, 530 U.S. at 541 (O'Connor, J., dissenting)). Federal law "explicitly cross-references" the Guidelines, *Ring*, 122 S. Ct. at 2440, and requires specific Guideline or departure findings before imposition of a higher penalty is authorized. For these reasons, the principle *Apprendi* established should apply to the Guidelines, and all other "determinate-sentencing schemes in which the length of a defendant's sentence within the statutory range turns on specific factual determinations." *Apprendi*, 530 U.S. at

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[5] The Court did not have to resolve the plain meaning of the statute because, even assuming ambiguity existed, both legislative history and the rule of lenity supported the conclusion that "maximum term . . . authorized" referred to the maximum guideline sentence. *Id.* at 298–307.

544 (O'Connor, J., dissenting).[6]

Because the District Court's enhancement of Johnson's sentence under the Guidelines was based on its own findings of fact and not those of the jury, resulting in a sentence at least 15 years longer than that permitted by the jury verdict, that sentence "was imposed in violation of law."

CONCLUSION

The District Court based its Guidelines calculations upon its own findings rather than on the jury's findings, resulting in a sentence much longer than that authorized by the constitutional principles underlying *Apprendi*. The sentence thus "was imposed in violation of law." Johnson accordingly asks that this Court vacate the sentence imposed and remand the case for resentencing.

Dated at Milwaukee, Wisconsin, January 15, 2003.

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[6] Three other Justices joined Justice O'Connor in her *Apprendi* dissent. *See id.* at 523. And the *Ring* majority heavily relied on it. *See Ring*, 122 S. Ct. at 2440–42.

Respectfully submitted,

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RULE 32(a)(7) CERTIFICATION

I hereby certify that this brief complies with the type volume limitations contained in Fed. R. App. P. 32(a)(7) for a principal brief produced with a proportionally-spaced font. The length of the includable portions of this brief, *see* Fed. R. App. P. 32(a)(7)(B)(iii), is 4,020 words as determined using the word count of the WordPerfect word-processing program used to prepare the brief.

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Robert R. Henak

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CIRCUIT RULE 30(c) STATEMENT

The items required by Circuit Rules 30(a) & (b) have been bound with appellant's brief.

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Robert R. Henak

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January, 2003, I caused 15 hard copies of the Brief and Appendix of Defendant-Appellant James E. Johnson to be mailed, properly addressed and postage prepaid, to the United States Court of Appeals for the Seventh Circuit, 219 South Dearborn Street, Chicago, Illinois 60604. I further certify that on the same date, I caused two hard copies of that document and one copy of the Brief on digital media to be mailed, properly addressed and postage prepaid, to counsel for the Government, AUSA Paul L. Kanter, Eastern District of Wisconsin, 517 East Wisconsin Ave., Milwaukee, WI 53202

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