As a summer associate at Jarndyce & Jarndyce, I prepared the attached memorandum for a pro bono assignment in the litigation department. The memorandum examined whether the fees charged by commercial tax preparers for “instant refund loans” would violate the state usury laws in New York, New Jersey, Pennsylvania, or Connecticut.

To preserve client confidentiality, all individual names and locations have been changed, and some portions have been redacted (as indicated in brackets in the text). I have received permission from my employer to use this memorandum as a writing sample.
The attached writing sample is an excerpt from a brief submitted for the Morris Tyler Moot Court of Appeals competition. The case involved a challenge to the Connecticut sex offender registration statute. The competition problem differed somewhat from the actual case then pending before the United States Supreme Court, and competitors were not permitted to rely on materials submitted to the Court. The questions presented for competition were:

1. Does Connecticut’s sex offender registration law implicate an offender’s liberty interest by listing offenders in an undifferentiated registry and violate an offender’s due process rights by failing to afford an offender a hearing on his current dangerousness before publishing true and accurate information about him and his conviction history?

2. Does Connecticut’s sex offender registration law, on its face or as implemented, impose punishment for purposes of the Ex Post Facto Clause of the United States Constitution?

I represented the petitioner, the Connecticut Department of Public Safety. I chose the section of brief addressing the Ex Post Facto Clause as my writing sample.

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1 The first paragraph would also be the appropriate place to summarize any facts in the case necessary to understand the argument, instead of including a lengthy statement of facts.