

## **Sentencing**

*Southern Union Co. v. United States*, 567 U.S. \_\_ (June 21, 2012)

(<http://www.supremecourt.gov/opinions/11pdf/11-94a1b2.pdf>). The Court held that the *Apprendi* rule applies to fines. Thus, any fact that increases a defendant's statutory maximum fine must be found by a jury beyond a reasonable doubt.