

## **Ex Post Facto**

[Peugh v. United States](#), 569 U.S. \_\_\_ (June 10, 2013). The Court held that retroactive application of amended Federal Sentencing Guidelines to the defendant's convictions violated the Ex Post Facto Clause. The defendant was convicted for conduct occurring in 1999 and 2000. At sentencing he argued that the Ex Post Facto Clause required that he be sentenced under the 1998 version of the Guidelines in effect when he committed the offenses, not under the 2009 version, which was in effect at the time of sentencing. Under the 1998 version, his sentencing range was 30-37 months; under the 2009 version it was 70-87 months. The lower courts rejected the defendant's argument and the Supreme Court reversed.