

## **Counsel Issues**

[Luis v. United States](#), 578 U.S. \_\_\_\_ (Mar. 30, 2016). The defendant's Sixth Amendment right to secure counsel of choice was violated when the government, acting pursuant to 18 U. S. C. §1345, froze pretrial the defendant's legitimate, untainted assets and thus prevented her from hiring counsel to defend her in the criminal case. Critical to the Court's analysis was that the property at issue belonged to the defendant and was not "loot, contraband, or otherwise 'tainted.'"