

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	No. 99-CR-10371-RGS
)	
JAMES J. BULGER)	
_____)	

DEFENDANT JAMES J. BULGER'S
MOTION TO APPOINT ATTORNEY JANICE BASSIL AS CO-COUNSEL

The defendant moves that this Court appoint Attorney Janice Bassil as co-counsel to Attorney J. W. Carney, Jr.

The defendant avers the following facts in support of this motion.

1. The defendant was determined to be indigent on June 30, 2011, and this Court appointed Attorney J. W. Carney, Jr. to represent him.

2. The indictment alleges a racketeering conspiracy that included alleged extortion, loansharking, trafficking in narcotics, and committing crimes of violence. The specific racketeering acts include allegations of nineteen separate murders from 1973 to 1985.

3. The investigation of this case will be an enormous undertaking, particularly since the average preparation time for

a single murder is usually eighteen to twenty-four months. In addition, the case presents a host of complex legal issues which must be researched and briefed. Moreover, trial preparation must be thorough, effective, and cutting-edge. The length of the trial (or of the multiple trials) cannot even be predicted at this time, especially where the trial of a single murder charge can last weeks.

4. There are many related prosecutions that include alleged co-conspirators of the defendant, as well as cases involving prospective government witnesses. Trials both within and without Massachusetts will be relevant to this case. Tens of thousands of documents and transcripts will need to be obtained and scrutinized.

5. Attorney Janice Bassil is superbly qualified to be appointed as co-counsel in this case. She has been a member of the Massachusetts bar since 1978, and her career has included six years as a full-time public defender, and twenty-seven years in private practice. Attorney Bassil is a member of the CJA Panel in this District, and has been qualified to handle court-appointed murder cases in the Massachusetts State Courts. She has represented defendants in high-profile cases with outstanding outcomes. Attorney Bassil also is a member of the American College of Trial Lawyers, as is Attorney Carney. She and Attorney Carney formed the firm of Carney and Bassil in

1989, and it has thirteen attorneys who are partners, associates, or of counsel. Appointment of Attorney Bassil would mean that the defendant's co-counsel will be able to work together in the most efficient manner in overseeing a team of lawyers, investigators, experts, and support staff.

WHEREFORE, the defendant moves that this Court appoint Attorney Janice Bassil as co-counsel in this case.

James J. Bulger
By His Attorneys

CARNEY & BASSIL

J. W. Carney, Jr.

J. W. Carney, Jr.
B.B.O. # 074760
Carney & Bassil
20 Park Plaza, Suite 1405
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617-338-5566

July 5, 2011

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

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AFFIDAVIT SUPPORTING
DEFENDANT JAMES J. BULGER'S
MOTION TO APPOINT ATTORNEY JANICE BASSIL AS CO-COUNSEL

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.

J. W. Carney, Jr.

July 5, 2011