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**POINT VI** attacks a cluster of prejudicially erroneous evidentiary rulings – collectively infringing Guzman’s rights to cross-examine and defend – claiming they deserve no deference because founded on misapprehensions of controlling legal principles.

**POINT VII** faults the district court for eschewing inquiry or investigation as to published reports appearing to implicate lead defense counsel in criminal activity sufficiently related to the charges to create a *per se* conflict of interest requiring automatic reversal, without a showing of concrete harm or adverse effect.

**POINT VIII** argues that the court erred in precluding Guzman’s government bias defense attacking the investigation’s caliber and integrity and assailing the decision to indict – a common and legitimate trial tactic recognized and endorsed by the Supreme Court.

### **Post-Trial Issues**

In a published report released days after the verdict, a juror volunteered that they and several others had (a) violated their oath and instructions throughout Guzman’s trial by closely following and regularly discussing the case’s unprecedented media coverage and (b) colluded to

cover up their misconduct by deliberately lying to the court when queried on the subject. Among the items the jurors consulted and discussed were stories detailing allegations, ruled too prejudicial to admit as evidence at trial, that Guzman had drugged and raped underage girls. **POINT IX** argues that these revelations – impugning the jurors’ fitness to serve and undermining the trial’s structural integrity and reliability – require exploration through an evidentiary hearing or a new trial. Guzman further contends that the district court reversibly erred in denying relief summarily, without inquiry or investigation.

Finally, **POINT X** seeks remand to another district judge to investigate information appearing to implicate the prosecution and trial court in improper ex parte communications, an undisclosed shadow counsel arrangement and conducting private judicial proceedings with Guzman absent his counsel of record.