

PROFESSIONAL WRITING PORTFOLIO

Research • Technical Content • Marketing Copy • Public Information •
Legal Analysis

Jardin Gwin

Lawrenceville, Georgia

Research-Driven Content Writer

Bachelor of Science in Political Science — Expected December 2026

Selected professional, independent, and high-scoring academic writing samples

About the Writer

Jardin Gwin is a research-driven content writer who transforms complex information into clear, organized, audience-appropriate content. This portfolio demonstrates experience with online research, technical product writing, marketing copy, public-facing information, marketplace analysis, and legal and policy-related academic writing. The samples show an ability to evaluate sources, identify important facts, organize findings, explain technical subjects, and adapt tone for consumers, businesses, public audiences, and academic readers.

Core Writing Strengths

- Online research and source evaluation
- Technical and product content
- Marketing and promotional copy
- Research summaries, briefs, and recommendations
- Public-facing informational writing
- Legal, policy, and academic analysis
- AI-assisted research, outlining, editing, and quality review

Portfolio note: The candidate-information and murder-investigation pieces are fictional writing exercises. Academic papers are included to demonstrate research, synthesis, and analytical writing. Product specifications and market information reflect the research available when each sample was prepared.

Portfolio Contents

Technical & Research Writing

- **PowerColor Reaper RX 9070 GRE Compatibility Guide** — Technical product research, compatibility guidance, source verification, and consumer-focused writing.
- **AI-Assisted E-commerce Product Research & Marketplace Verification** — Marketplace research, competitor pricing, product verification, data organization, and written recommendations.

Marketing & Copywriting

- **MSI GeForce RTX 5060 Ti Product Advertisement** — Feature-led product copy, benefit statements, specification writing, and a direct call to action.
- **Gwin Analytics Promotional Copy** — Small-business promotional copy centered on customer pain points, services, benefits, and conversion.

Informational & Public-Facing Writing

- **Georgia Secretary of State Candidate Information** — Neutral public information writing that explains a government office and directs readers to authoritative resources.
- **John Williams Murder Investigation Case Summary** — Fictional incident-summary writing organized in chronological order with a concise reporting tone.

Academic Research & Legal Analysis

- **Heart of Atlanta Motel, Inc. v. United States Case Brief** — Legal issue identification, case synthesis, rule application, and evidence-based analysis.
- **Contraband Cigarette Trafficking into New York City** — Long-form research writing on market incentives, illicit enterprise structure, and economic behavior.
- **Statutory Interpretation and Judicial Restraint** — Technical statutory analysis, source integration, judicial reasoning, and persuasive academic writing.

Technical & Research Writing

Selected samples demonstrating adaptable research and writing skills

PowerColor Reaper RX 9070 GRE Compatibility Guide

Skills demonstrated: Technical product research, compatibility guidance, source verification, and consumer-focused writing.

The PowerColor Reaper RX 9070 GRE should work well in many standard mid-tower and full-tower gaming PCs, but it is not a small graphics card. Before purchasing, make sure your case has adequate clearance, your power supply meets AMD's recommended wattage, and two available 8-pin PCIe power connectors are ready for installation.

Affiliate Disclosure: As an Amazon Associate I earn from qualifying purchases. This article contains affiliate links, and I may earn a commission at no additional cost to you.

Research disclosure: This is a research-based compatibility guide. I have not conducted independent hands-on benchmark testing of this graphics card. Specifications were checked against official information from AMD and PowerColor.

PowerColor Reaper RX 9070 GRE overview

The PowerColor Reaper AMD Radeon RX 9070 GRE is a 12GB graphics card designed for desktop gaming systems. It uses AMD's Radeon RX 9000-series platform and combines 3,072 stream processors, 48 compute units, 48 ray accelerators, and 96 AI accelerators.

AMD positions the RX 9070 GRE primarily for high-quality 1440p gaming. The card has a listed game frequency of 2,220 MHz and can boost up to 2,790 MHz under suitable operating conditions.

Before purchasing this exact PowerColor model, buyers should confirm three important details:

- The case has enough room for a card measuring up to 304 mm long.
- The power supply provides at least 650 watts of suitable capacity.
- The power supply has two available 8-pin PCIe power connectors.

Quick compatibility verdict

Although the card itself is listed at 289 mm long, PowerColor lists its full dimensions with the mounting bracket as **304 × 127 × 42 mm**. It occupies two expansion slots and requires two 8-pin PCIe power connectors. PowerColor and AMD both list a 650W minimum power-supply recommendation.

A case with at least **315 to 320 mm of usable GPU clearance** would be a sensible target. That additional room is my recommendation rather than an official PowerColor requirement. It can make installation and cable management easier, especially when front-mounted fans or a radiator reduce the available space.

Key specifications:

Specification	PowerColor Reaper RX 9070 GRE
GPU	AMD Radeon RX 9070 GRE
PowerColor model	RX9070GRE 12G-A
Compute units	48
Stream processors	3,072
Ray accelerators	48
AI accelerators	96
Game frequency	2,220 MHz
Boost frequency	Up to 2,790 MHz
Video memory	12GB GDDR6
Memory speed	Up to 18 Gbps
Memory interface	192-bit
Memory bandwidth	Up to 432 GB/s
Infinity Cache	48MB
Typical board power	220W
Minimum recommended PSU	650W
Power connectors	Two 8-pin PCIe connectors
Slot thickness	Two slots
Dimensions with bracket	304 × 127 × 42 mm
Display standards	DisplayPort 2.1a and HDMI 2.1b

AMD officially lists the 12GB GDDR6 memory, 192-bit memory interface, 432 GB/s maximum memory bandwidth, 48MB of Infinity Cache, 220W typical board power, and 650W minimum PSU recommendation.

Will the PowerColor Reaper RX 9070 GRE fit your case?

PowerColor provides two sets of dimensions:

- Card body: 289 × 111 × 41 mm
- With mounting bracket: 304 × 127 × 42 mm

For compatibility planning, use the larger **304 mm measurement**. The bracket is part of the installed card, so relying only on the smaller card-body measurement could result in an unpleasant surprise during installation.

How to check your case

Look up your case manufacturer's listed maximum GPU length. You can also measure the available space inside your computer.

Measure from the rear expansion-slot area toward the front of the case. Stop at the first obstruction, which may include:

- Front case fans
- A liquid-cooling radiator
- A drive cage
- Internal brackets
- Tubing or cables

Your case must also have two adjacent expansion-slot openings available.

A case advertised with exactly 304 mm of GPU clearance may technically meet the measurement, but it would leave almost no installation margin. A little extra space is preferable.

Power-supply requirements

AMD lists a **650W minimum PSU recommendation**, while the graphics card itself has a typical board power of 220W. The card receives external power through **two 8-pin PCIe connectors**.

A properly functioning, good-quality 650W unit may be sufficient for a balanced system. However, the wattage number alone does not tell the whole story.

You should also consider:

- Your processor's power consumption
- The PSU's age and condition
- Whether the unit has two suitable PCIe connectors
- Additional drives, fans, pumps, and accessories
- Future upgrades
- The PSU manufacturer's quality and warranty

A 750W power supply is not officially required, but it may provide more headroom when pairing the GPU with a power-hungry processor or planning future upgrades.

Do not assume that an old or low-quality 650W power supply is automatically appropriate simply because it meets the wattage printed in the specifications.

Power-connector requirements

The Reaper RX 9070 GRE requires:

Two 8-pin PCIe power connections

Before buying, inspect your power supply or its documentation and make sure those connectors are available. Do not confuse PCIe GPU cables with the similarly shaped CPU power cable used near the motherboard's processor socket.

Modular power-supply cables should only be used with the exact PSU model for which they were designed. Cables from different modular units are not automatically interchangeable.

Motherboard compatibility

The graphics card requires a full-length PCIe x16 expansion slot. Before installation, confirm that:

- The motherboard has an available PCIe x16 slot.
- No other expansion card blocks the required two-slot area.
- The case provides enough physical clearance.
- The motherboard BIOS is reasonably current.
- Your power supply meets the card's requirements.

The card's size and power connections are more likely to cause compatibility issues than the motherboard slot in a typical modern desktop gaming PC.

Memory and display capabilities

The RX 9070 GRE includes **12GB of GDDR6 memory** running at up to 18 Gbps across a 192-bit interface. Its listed maximum memory bandwidth is 432 GB/s.

AMD lists support for:

- DisplayPort 2.1a
- HDMI 2.1b
- AV1 encoding and decoding
- H.264 encoding and decoding
- H.265/HEVC encoding and decoding

These features can make the GPU relevant to gaming, video playback, recording, and streaming systems, although application support and complete system configuration will affect the final experience.

Strengths

Reasonable size for its class

At two slots thick and 304 mm long with the bracket, the Reaper is not a compact card, but it is less bulky than many oversized premium graphics cards. Its design may make it easier to use in a broader selection of mid-tower cases.

Standard 8-pin power connectors

The use of two traditional 8-pin PCIe connectors may simplify compatibility for builders whose existing power supplies already include the required cables.

12GB of video memory

The card includes 12GB of GDDR6, giving it more memory capacity than older 8GB gaming cards. Whether 12GB is sufficient over the long term will depend on game settings, resolution, future software requirements, and the buyer's expectations.

Modern display and media support

DisplayPort 2.1a, HDMI 2.1b, and AV1 support provide compatibility with current display and media technologies.

Limitations and buyer considerations

It still requires careful measurement

The card is more than 300 mm long once the bracket is included. Some compact cases and older mid-tower cases may not provide enough room, especially when front-mounted cooling hardware is installed.

Two power connectors are required

Buyers upgrading from an entry-level GPU may discover that their existing power supply lacks the required connectors or capacity. That could add the cost of a replacement PSU to the upgrade.

The 12GB memory capacity may not suit every buyer

Twelve gigabytes should be considered in relation to the card's price and intended use. Buyers specifically seeking maximum long-term memory capacity or demanding high-resolution workloads may also want to compare available 16GB alternatives.

Value depends heavily on current pricing

Graphics-card pricing and availability can change quickly. The Reaper RX 9070 GRE should therefore be evaluated against similarly priced alternatives at the time of purchase, rather than judged only by its model name or specifications.

Who should consider this GPU?

The PowerColor Reaper RX 9070 GRE may be a suitable option for someone who:

- Primarily targets 1440p gaming
- Has a compatible mid-tower or full-tower case
- Has at least 304 mm of physical clearance
- Uses a suitable 650W or larger power supply
- Has two available 8-pin PCIe power connectors
- Wants a current-generation AMD graphics card with 12GB of memory
- Prefers a two-slot design over a much thicker premium model

Who should consider another option?

You may need a different graphics card if:

- Your case cannot accommodate a 304 mm card.
- Your power supply is below the recommended capacity.
- Your PSU lacks two 8-pin PCIe connectors.
- You specifically need more than 12GB of video memory.
- You want a smaller card for a compact PC.
- The current selling price is too close to a faster or higher-memory alternative.

My Final verdict

The PowerColor Reaper RX 9070 GRE offers a practical combination of 12GB GDDR6 memory, a two-slot cooler, standard 8-pin power connectors, and a 650W minimum PSU recommendation.

Its most important compatibility concern is length. Buyers should plan around the complete **304 mm measurement**, not only the 289 mm card-body figure. A case with roughly 315 to 320 mm of usable GPU space would provide a more comfortable installation margin.

This card makes the most sense for a 1440p-focused buyer who already has a capable power supply and a case with adequate clearance. The final buying decision should also consider its current price compared with other GPUs available in the same range.

Check the current price

Featured GPU: PowerColor Reaper AMD Radeon RX 9070 GRE 12GB GDDR6

As an Amazon Associate, I earn from qualifying purchases.

Check the current price on Amazon - Sponsored

Affiliate Disclosure: As an Amazon Associate I earn from qualifying purchases. This post contains affiliate links, and I may earn a commission at no additional cost to you.

Sources

Technical specifications in this article were researched using the official AMD Radeon RX 9070 GRE product page and PowerColor's official Reaper RX 9070 GRE product information.

AI-Assisted E-commerce Product Research & Marketplace Verification

Skills demonstrated: Marketplace research, competitor pricing, product verification, data organization, and written recommendations.

AI-Assisted E-commerce Product Research & Marketplace Verification Project

Case Study 1: Office Supplies Category

Prepared by: Jardin Gwin | **Project Area:** Survey Research, Consumer Insights, E-commerce Product Research, Pricing Analysis, Marketplace Verification

Tools Used	Walmart, Amazon, Keepa, eBay Sold Listings, Google Shopping, Excel, AI-assisted research prompts
Product Category	Office supplies
Core Output	Excel product research tracker, marketplace verification notes, and written insight summary

Project Overview

This case study documents an AI-assisted e-commerce product research workflow focused on office supplies. The purpose of the project was to compare Walmart rollback and discounted products against Amazon, Keepa, eBay sold listings, and Google Shopping to evaluate product pricing, marketplace demand, price history, product match quality, and potential market opportunity.

The research was completed as part of a larger portfolio project focused on consumer insights, product research, pricing comparison, and marketplace analysis. Products were reviewed and classified as Good Lead, Maybe, Weak, Skip, or Comparable Product based on cross-platform evidence.

Research Objective

The goal of this research was to determine whether selected Walmart office supply products had strong enough marketplace signals to be considered viable product research candidates.

1. Is Walmart offering the product at a lower price than other marketplaces?
2. Does the product have an exact or close match on Amazon?
3. Does Keepa show stable Amazon pricing and a realistic Buy Box price?
4. Do eBay sold listings show real buyer demand?
5. Is the product easy to compare by brand, model, size, color, and pack count?
6. Should the product be marked as a strong candidate, weak candidate, or skipped?

Products Researched

The office supplies category included four branded products selected because they were small, recognizable, lightweight, and easier to compare across online marketplaces:

Pilot G2 Retractable Gel Ink Pens, Fine Point, 0.7mm, Black Ink, 5 Pack

Sharpie S-Gel Pens, Medium Point, 0.7mm, Black Ink, Assorted Fashion Barrel Colors, 4 Count

uniball Jetstream RT Retractable Ballpoint Pens, Fine Point, 0.7mm, Black Ink, 4 Count

Bostitch Flat Clinch Manual Stapler, 40 Sheets, Black

Research Process

1. Found Walmart rollback or discounted office supply products.
2. Copied exact product names, pack counts, colors, prices, reviews, and model details.
3. Searched each product on Amazon to locate exact or close marketplace matches.
4. Used Keepa to verify Amazon price history, Buy Box pricing, and product match quality.
5. Searched eBay sold listings to confirm real marketplace demand.
6. Used Google Shopping to compare other online store prices.
7. Entered findings into Excel.
8. Assigned a final research status based on verified marketplace evidence.

Product Research Summary

Product	Walmart Price	Amazon Result	eBay Sold Result	Keepa Result	Final Status
Pilot G2 0.7mm Black Ink, 5 Pack	\$5.97	No exact 5-pack found. Closest Amazon result was a 4-pack at \$5.53 and a 14-pack at \$12.99.	Not fully verified yet	Not fully verified yet	Maybe / Weak
Sharpie S-Gel 0.7mm Black Ink, 4 Count	\$4.87	Amazon 4-count found at \$4.87, same as Walmart price.	Not needed after Amazon result	Not needed after Amazon result	Skip
uniball Jetstream RT 0.7mm Black Ink, 4 Count	\$3.97	Amazon results were mixed at first.	Sold activity around \$8.00 + shipping and \$13.39.	Keepa found a close/exact 4-pack match around \$3.47, lower than Walmart.	Skip
Bostitch Flat Clinch Stapler, 40 Sheets	\$9.76	Amazon match found around \$16.00.	Sold results found at \$13.66 free delivery and \$9.13 +	Not fully verified yet	Maybe / Weak

			\$8.06 delivery.		
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Key Findings

The office supplies category produced stronger branded products than the previous kitchen tools category because brands like Pilot, Sharpie, uniball, and Bostitch had clearer product names, stronger review counts, and better cross-platform searchability.

Most items still failed final marketplace verification because Amazon pricing was equal to or lower than Walmart pricing, exact product matches were missing, or eBay sold margins were too weak.

The strongest initial product candidate was the uniball Jetstream RT 4 Count because Walmart showed a low rollback price and eBay sold listings showed some demand. However, Keepa later showed a close or exact Amazon match priced lower than Walmart, which removed the price advantage and caused the product to be marked as Skip.

The Bostitch Flat Clinch Stapler showed some potential because Amazon had a higher price than Walmart, and eBay sold listings confirmed that similar products were selling. However, eBay sold prices were not high enough to prove a strong margin after shipping and fees, so the product was marked Maybe / Weak.

The Sharpie S-Gel 4 Count was rejected because Amazon matched Walmart's price exactly, leaving no meaningful price gap.

The Pilot G2 5 Pack was marked Maybe / Weak because Amazon did not show the exact 5-pack configuration. The closest match was a 4-pack, which made the comparison less reliable.

Final Product Decisions

Pilot G2 Retractable Gel Ink Pens

Final Status: Maybe / Weak

Reason: No exact Amazon 5-pack match was found. The closest Amazon product was a 4-pack at \$5.53, while Walmart had a 5-pack at \$5.97. Because the pack count did not match exactly, the product could not be verified as a strong research candidate.

Sharpie S-Gel Pens

Final Status: Skip

Reason: Amazon showed a 4-count match at \$4.87, which was the same as Walmart's price. Since there was no price gap, the item was not worth further research.

uniball Jetstream RT Pens

Final Status: Skip

Reason: Walmart showed the product at \$3.97, and eBay showed some sold activity. However, Keepa found a close or exact Amazon 4-pack match around \$3.47, which was lower than Walmart's price. This removed the price advantage and made the product unsuitable as a lead.

Bostitch Flat Clinch Manual Stapler

Final Status: Maybe / Weak

Reason: Walmart showed the stapler at \$9.76, while Amazon showed a close match around \$16.00. eBay sold listings showed sales at \$13.66 with free delivery and \$9.13 plus shipping. Demand existed, but the margin appeared weak after shipping and marketplace fees.

Research Conclusion

This office supplies research session showed that recognizable brands make product comparison easier, but brand recognition alone does not create a strong marketplace opportunity. The final decision depends on exact product matching, price gaps, Amazon/Keepa price history, eBay sold evidence, and overall marketplace demand.

The research also showed the importance of rejecting weak products. Even when an item appears discounted on Walmart, it may not be a strong opportunity if Amazon is cheaper, eBay sold prices are low, or the exact product match is unclear.

This case study demonstrates a structured product research workflow that can support e-commerce research, pricing analysis, category analysis, consumer insights, and marketplace reporting.

Skills Demonstrated

Conducted online product research

Compared competitor pricing across marketplaces

Verified product matches across Walmart, Amazon, eBay, Google Shopping, and Keepa

Analyzed customer demand signals using reviews, ratings, sold listings, and price history

Organized research findings in Excel

Classified products based on evidence

Wrote clear insight summaries and final recommendations

Used AI-assisted workflows to speed up research and reporting

Marketing & Copywriting

Selected samples demonstrating adaptable research and writing skills

MSI GeForce RTX 5060 Ti Product Advertisement

Skills demonstrated: Feature-led product copy, benefit statements, specification writing, and a direct call to action.

Product Advertisement Copy: MSI GeForce RTX 5060 Ti 16G VENTUS 2X OC PLUS

Ready to Upgrade Your PC's Graphics Performance?

Are you looking for smoother gaming, enhanced visual quality, and enough video memory for demanding modern games and creative applications?

Meet the MSI GeForce RTX 5060 Ti 16G VENTUS 2X OC PLUS—a compact graphics card powered by NVIDIA's Blackwell architecture. With 16GB of fast GDDR7 memory and support for DLSS 4.5, it is designed to deliver responsive performance, AI-enhanced graphics, and advanced ray-tracing capabilities.

Key Specifications

- NVIDIA Blackwell architecture
- 4,608 CUDA cores
- Boost clock up to 2,602 MHz
- 16GB GDDR7 memory
- 128-bit memory interface
- Three DisplayPort 2.1b outputs
- One HDMI 2.1b output
- One 8-pin power connector
- Recommended 600W power supply

Its compact 227 mm design makes it worth considering for gamers and creators who want modern RTX features without installing an excessively large graphics card.

Upgrade your gaming and creative setup with the MSI GeForce RTX 5060 Ti 16G VENTUS 2X OC PLUS. Check current pricing and availability from an authorized retailer today.

Gwin Analytics Promotional Copy

Skills demonstrated: Small-business promotional copy centered on customer pain points, services, benefits, and conversion.

Promotional Copy Sample: Gwin Analytics

Struggling to understand your business finances?

Do you feel overwhelmed by your numbers or wonder why your competitors seem to be growing faster?

Gwin Analytics helps small businesses turn confusing business information into clear, actionable insights. Our detailed Business Snapshot Reports can help you:

- Better understand your business performance
- Organize and review your data
- Improve revenue and profitability visibility
- Identify opportunities for growth
- Build customized systems for tracking operations

Based in Lawrenceville, Georgia, Gwin Analytics provides practical market research and business insights designed for small-business owners.

Take the guesswork out of your business decisions.

Call Gwin Analytics today at 770-412-8970.

Informational & Public-Facing Writing

Selected samples demonstrating adaptable research and writing skills

Georgia Secretary of State Candidate Information

Skills demonstrated: Neutral public information writing that explains a government office and directs readers to authoritative resources.

Sample type: Fictional writing exercise created to demonstrate tone, organization, and format.

Informational Writing Sample: Georgia Secretary of State Candidate Information

Dana Barrett, a Fulton County Commissioner, is running for Georgia Secretary of State.

The Georgia Secretary of State oversees several important state functions, including elections and voter registration, business filings, professional licensing, and securities regulation.

Barrett's campaign has identified election administration, voting rights, small-business support, and preventing fraud and abuse as central areas of focus.

Georgia voters can learn about voter registration, early voting, absentee voting, polling locations, and election deadlines through the official Georgia Secretary of State elections website.

Campaign information should be verified through the candidate's official website. Voting procedures and deadlines should be confirmed through official state election resources.

John Williams Murder Investigation Case Summary

Skills demonstrated: Fictional incident-summary writing organized in chronological order with a concise reporting tone.

Sample type: Fictional writing exercise created to demonstrate tone, organization, and format.

Case Summary: John Williams Murder Investigation

The murder case of John Williams, in the summer of 1995 police showed up at the house at the address of 214 Patterson Blvd. When they entered the premises of Mr. Williams, officers stepped out of their vehicle and proceeded to walk up to the door. Upon knocking and yelling, “Hello! Anybody home? It’s Lawrenceville Police!” they noticed no one answered. They forced open the locked door and walked into a horrific scene.

They observed Mr. Williams’ bloodied body slumped over the couch with several stab wounds to his chest. The suspected murder weapon was spotted just a few feet away. Officers Blake and Gwin immediately called for backup and the coroner, who arrived within minutes. Investigators and forensic specialists secured the scene, collected evidence, and began interviewing witnesses.

Later, two witnesses were transported to headquarters in downtown Lawrenceville for additional questioning. The investigation remains ongoing as authorities work to determine exactly what occurred on June 5, 1995, at approximately 4:00 p.m.

Academic Research & Legal Analysis

Selected samples demonstrating adaptable research and writing skills

Heart of Atlanta Motel, Inc. v. United States Case Brief

Skills demonstrated: Legal issue identification, case synthesis, rule application, and evidence-based analysis.

Sample type: Academic assignment included as evidence of research, synthesis, and analytical writing.

Case Brief 1

Heart of Atlanta Motel, Inc. v. United States
, 379 U.S. 241 (1964)

Case facts:

The Heart of Atlanta Motel was a large well known motel in the Atlanta, Georgia area. The motel had a total of to hundred sixteen rooms, it was close to highways, it was seen by travelers coming from different states, and about 75% of visitors were mostly highway travelers. The motel's policy was set to that it wasn't allowed to rent to black people and continued that policy even after Title II of the Civil Rights Act of 1964 was passed by congress. Title II didn't allow racial discrimination in places of public lodging when its daily operations started affecting the revenue it was would receive by its customers who traveled the highway via Commerce. The motel stated that Congress went beyond its authority under the Commerce Clause and also said that the law violated the Fifth and Thirteenth Amendments.

Procedural History:

Heart of Atlanta Motel filed a lawsuit in federal court looking for relief and was wanting to stop enforcement of Title II rule of the Civil Rights Act of 1964. A three-judge federal District Court kept Title II to continue on and seem to enjoy the motel from not allowing to serve black people due to race. The case was later appealed towards the United States Supreme Court.

Issue(s):

Whether Congress went beyond its power under the Commerce Clause through using Title II of the Civil Rights Act of 1964, to a privately owned motel that served visitors traveling the highway. A second issue was if Title II violated the motel owner's Fifth Amendment property rights or the Thirteenth Amendment didn't allow involuntary servitude.

Holding:

No. The Supreme Court stood on their word by maintaining that Congress did not go beyond its Commerce Clause power. Title II of the Civil Rights Act of 1964 was constitutional used in the operations of both hotels and motels serving travelers. The Court also rejected the motel's Fifth and Thirteenth Amendment statements.

Rule(s):

The Commerce Clause gives Congress the power to regulate commerce within the states. Under the modern Commerce Clause doctrine, Congress may regulate local activity when that activity has a

considerable harmful effect on interstate commerce. The Cornell Wex explains that the Supreme Court has explained the Commerce Clause and has allowed Congress to allow for local activity when it is part of a larger interstate commercial system or has some type of economic effect on interstate commerce.

This case also relates to Chapter 7 of *Constitutional Law for a Changing America: Institutional Powers and Constraints*, which goes over the expansion of the commerce power. The chapter explains that, during the time of growth Commerce Clause jurisprudence, Congress used the Commerce Clause to allow local activity when that activity affected interstate commerce. The Civil Rights Act of 1964 and *Heart of Atlanta Motel* fit that time period because Congress used its commerce rule to handle discrimination in public lodging places.

Application/Analysis:

The Court used the Commerce Clause by looking at how the motel was related to interstate travel. Although the motel was in Georgia, its business was not just local because it provided service to travelers who came from different states, seen by people outside of Georgia, and was near interstate highways. The Court did recognize that people travelled across state was commerce and that Congress may protect interstate commerce from any barriers.

Because the motel refused to rent rooms to black people a barrier was created that affected interstate travel and also caused black people not to be able to travel from state to state. Congress had proof that racial discrimination in its hotels and motels was not allowed due to the fact that it started affecting interstate travel. The Court stated that Congress could remove that burden even though Congress was also handling both a moral and social wrong action. The Court also didn't accept the motel's Fifth Amendment argument because Title II did not take property unlawfully; it gave rules on how the motel should operate being that it was a public business. The Court also didn't accept the Thirteenth Amendment argument because it required the motel to serve all customers equally did not equal up to involuntary servitude.

Conclusion:

In conclusion, The Supreme Court in the end ruled in favor of the United States and against the Heart of Atlanta Motel. The Court confirmed the District Court's decision and kept Title II of the Civil Rights Act of 1964 as a useful exercise of Congress's Commerce Clause power.

Opinion paragraph:

I would agree with the Court's ruling because the motel's business was tied to interstate commerce. The motel provided service to out-of-state travelers, advertised to people not from Georgia, and operated near well known travel routes. Refusing to provide service to Black people it made travel more difficult due to inequality Congress had a good reason to put rules in place do to this conduct because racial discrimination in public accommodations created barriers, not just local problems. In my opinion, I believe the Court ruled correctly that Congress had the authority under the Commerce Clause to not allow this type of discrimination.

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Contraband Cigarette Trafficking into New York City

Skills demonstrated: Long-form research writing on market incentives, illicit enterprise structure, and economic behavior.

Sample type: Academic assignment included as evidence of research, synthesis, and analytical writing.

Title Page:

Contraband Cigarette Trafficking into New York City: An Enterprise Economic Essay

Jardin Gwin
Organized Crime
Dr. Gillespie
7-8-26

Contraband Cigarette Trafficking into New York City: An Enterprise Economic Essay

Macroeconomic Environment & Vacuum

Contraband cigarette trafficking into New York City is understood to be what's called the illicit market made by a steep tax distinction not by simple criminal issue. New York City has a small tight consumer market with a very high demand for tobacco products. It is widely known for having the one of the taxes on cigarette tax in the country. As an example, upstate New York has a tax of \$5.35 per pack and in New York City an extra \$1.50 is added on which brings the total price including tax per pack is \$6.85 within the city. Stated by the State of New York Department of Taxation and Finance, 2025. This system has a price gap which separates goods that are sold legally sold in the city and tobacco goods purchased in states with lower tax.

This gap makes what's called the "vacuum" that allows the illicit market to be created. Consumers still demand cigarettes, but legal retail prices rise due to taxes that are passed through the supply chain. Criminals tend to respond by providing cheaper untaxed or cigarettes that aren't correctly stamped. In this case, the illicit cigarette market fits Smith's broad-based theory of enterprise because the criminal activity mimics normal business behavior: seeing demand, finding a cheaper source of supply, and using a regulatory imbalance for profit Smith, 1980. The market survives because public demand still runs strong while the legal price is raised through taxing citizens.

Application of the Enterprise Continuum

The criminal network acts like a reasonable business because it operates around cost control, supply-chain movement, and maximizing profits. This type of business is called tax arbitrage. this is where tobacco goods are purchased in lower tax areas and are resold for higher margin in a high tax area. The ATF (The Bureau of Alcohol, Tobacco, Firearms and Explosives) says that people who transport tobacco goods buy these cigarette products in low tax places and will sell them in high tax places and not pay taxes Bureau of Alcohol, Tobacco, Firearms and Explosives, 2026. The ATF's case example of Virginia-to-New York City trafficking does show how this operates. Cigarettes

are bought for around \$4.70 per pack in Virginia and maybe resold for about \$13.50 in New York City, making the total approximate price of making \$8.80 in profits per pack Bureau of Alcohol, Tobacco, Firearms and Explosives, 2026.

The costs of this enterprise are similar to legal distribution business. People who are involved need transportation, gas, storage space, tools to communicate with, cash saved up on the side in case of an emergency, and access to people that communicate with in either the retail or wholesale space. They also must look out for any risk that the business will come across. Potential risks include law enforcement attention, product seizure, fines, and possible jail time increase the cost of running, but the large profit can also bring attention. This reflects Smith's argument that legal and illegal businesses exist along a continuum because both respond to opportunity, demand, and profit incentives Smith, 1980.

Distribution logistics also show the business planning side. The business must move products from main markets to destination markets, keep up with inventory, and contact sellers who can connect with consumers. Legitimate commerce is important because the product itself is legal when taxed and stamped correctly. This illegal activity tends to take place when the products are taken from lawful tax channels. This makes the market very useful for using Shelley and Melzer's smuggling structure because cigarette trafficking often mixes lawful companies, legal goods, criminal brokers, and illicit distribution channels Shelley & Melzer, 2008.

Organizational Topology

The organizational system of contraband cigarette trafficking into New York City is best known to be defined as a decentralized network that relies on independent secondary organizations not one single group. The main organization would control the entire operation from financing to purchasing, transportation, wholesale distribution, and retail sales. Cigarette trafficking may sometimes have coordinators, but the market is normally flexible. Different people can choose to specialize in different parts of the business.

The business may have source-state purchasers, transporters, storage handlers, wholesalers, retail sellers, and money handlers. Each group has the choice to operate semi-independently while still working with the larger illicit market. This system helps to lessen risk because the arrest of one person doesn't destroy the entire business. But it also allows the business to adjust quickly when law enforcement pressure increases. Secondary groups are helpful for high-risk tasks such as transportation, storage, and retail distribution.

This supports what's called the enterprise-continuum approach, this is because the network looks more like a broken supply chain than a traditional mafia-style hierarchy. The product is legal, but the consumer demand is real, and the opportunity to make too money comes from steering away from both regulation and taxation. So, contraband cigarette trafficking into New York City is not a criminal activity; But, it is an illicit business that was created by the connection between the relationships of consumer demand, legal price barriers, and rational entrepreneurial behavior.

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Smith, D. C., Jr. 1980. Paragons, pariahs, and pirates: A spectrum-based theory of enterprise. *Crime & Delinquency*, 263, 358–386.

Statutory Interpretation and Judicial Restraint

Skills demonstrated: Technical statutory analysis, source integration, judicial reasoning, and persuasive academic writing.

Sample type: Academic assignment included as evidence of research, synthesis, and analytical writing.

Statutory Interpretation and Judicial Restraint in M & K Employee Solutions V. Trustees of IAM National Pension Fund Essay

Ronald Mann's article, Justices is in agreement with the actuaries can provide assumptions in looking into the costs of leaving a multi-employer pension plan, looking into the Supreme Court's decision in M & K Employee Solutions, LLC v. Trustees of the IAM National Pension Fund. Even though the case does not include constitutional rights such as free speech, due process, or equal protection, it is still important for constitutional law because it shows how the Supreme Court uses federal statutes and views the correct role of the judiciary. Mann explains that the case involved the Employee Retirement Income Security Act of 1974, also known by the name of ERISA, and the question of how actuaries should calculate the cost when an employer leaves a multiemployer pension plan.

This case began after several employers stopped using the Pension Fund, which this multiemployer pension plan didn't have enough money to continue to support it. Under ERISA, an employer that chooses to leave the plan must pay "withdrawal liability," this means that the employer's part of the plan's benefits. The issue focused on how that amount should be calculated. The employers mentioned that the actuary must use the assumptions that were already in the process on the statutory "measurement date," which is the last day of the plan year before the employer left the plan. The pension fund stated that the actuaries could use recent assumptions selected after that date has passed, as long as those assumptions were reasonable and showed the actuary's best estimate. The difference mattered because using the updated interest-rate assumption made the employer's liability much more. As an example, Mann says that one employer owed more than three times as much under the newer assumption than it would have owed under the lower rate.

The Supreme Court agreed with the pension fund. Justice Ketanji Brown Jackson wrote the opinion for the Court. The Court held that ERISA does not require actuarial assumptions to be selected on or before the measurement date. Instead, the Court mentioned that the measurement date fixes the "hard data" about the plan, such as the value of assets and the number of beneficiaries, but actuarial assumptions are different. They are not actual facts. They are prediction tools that are

used to guess the future of plan performance. Because of that, actuaries may choose to select those assumptions after the measurement date when doing the calculation.

Mann's study goes over that the Court's decision was a straightforward rejection of the idea that ERISA forces actuaries to use old assumptions. He describes Justice Jackson's opinion as tending to favor accuracy because actuarial assumptions are supposed to show reasonable expectations and the actuary's best estimate of future experience in the plan. The Court also showed that Congress included specific timing rules in other parts of ERISA but did not put together a similar deadline for selecting actuarial assumptions in this section. The Court did not want to add a deadline that Congress did not put in the statute.

This case relates to the lesson on Supreme Court decision-making. The first chapter power point explains that legal decision-making focuses on law, legal methods, constitutional text, history, tradition, and precedent, while realistic theories consider political and nonlegal factors. In *M & K Employee Solutions*, the Court took both a legal and text based approach. Other than focusing mostly on the financial impact on the employers or the pension fund, the Court focused on the words used on the ERISA. The Court stated that because the statute did not have a deadline for actuarial assumptions, justice should not be created on its own.

The case also holds back judicially. The employers warned that allowing actuaries to pick assumptions after the measurement date could make opportunities for manipulation. This concern can be understood because pension plans may have an incentive to pick assumptions that increase an employer's withdrawal liability. But the Court decided that any concerns raised about the policy cannot replace the best meaning of the statutory text. The Court stated that Congress chose which limits to include in ERISA, and it is not the Court's role to replace Congress's choices with its own policy choices. This is aligned to the constitutional principle of separation of powers because Congress writes the laws, while the Court explains them.

From my point of view, I think the Supreme Court made the right decision. Even though the result may seem harsh for employers who face a much higher withdrawal bill, the Court's job is not to rewrite the statute to create a fair business based outcome. The Court's job is to explain the law that Congress acted. If ERISA says actuarial assumptions must be reasonable and must reflect the actuary's best estimate, then it makes sense to let actuaries to use recent information instead of forcing them to only just use not current assumptions.

But I will say at the same time, I understand the employers' concern from a business viewpoint. A small change in the discount rate can greatly increase withdrawal liability. That tends to create major consequences for businesses leaving a pension plan. But the Court said that ERISA already allows employers to question actuarial assumptions in arbitration that don't appear to make sense. That is an important protection. If Congress believes stronger protections are needed, Congress can

improve ERISA and create a clearer rule about timing. But until that time comes, the Court should not create a deadline that the statute does not have.

In conclusion, *M & K Employee Solutions v. Trustees of the IAM National Pension Fund* is important because it shows how the Supreme Court handles technical statutory cases. The case may not be as politically controversial as cases involving abortion, voting rights, or the First Amendment, but it still shows a big theme in constitutional law. It shows the Court's job needing to explain the federal law, the importance of wording things, and the limits of judicial power. Mann's article shows the decision as short and useful, but the case still matters because it supports the idea that courts should follow the statute's text and leave major policy changes to Congress.

References

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