

PRIOR CONVICTIONS ≠ ELEMENTS

- *Almendarez-Torres v. United States*, 523 U.S. 224 (1998)
 - Holding that prior felony is not an element of the offense and need not be charged in the indictment
- *Rangel-Reyes v. United States*, 547 U.S. 1200 (2006)
 - Justice Thomas dissenting opinion from denial of certiorari calling for reconsideration of *Almendarez-Torres*