

## Supreme Court Holds That a RICO Claim Predicated on Mail Fraud Does Not Require a Showing of First-Party Reliance

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On June 9, 2008, the Supreme Court issued a unanimous decision in *Bridge v. Phoenix Bond & Indemnity Co.*<sup>1</sup> Resolving a split among the lower courts, the Court held that a plaintiff bringing a RICO claim predicated on mail fraud need not plead or prove that it relied on the defendant's alleged misrepresentations.