

INDIAN LAW: CRIMINAL LAW PANEL

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Michelle Rivard Parks: Good afternoon and thank you all for being here with us today, either in person or for those of you joining us virtually. As you can see, today has been chock-full of experts in the fields of tribal law and Indian law and this panel is certainly no different, so we want to thank all of our panelists for being here today. As we move into this final discussion, our hope is to get a little bit of information from practitioners in the field, relating to some of the topics discussed and the issues discussed. What does that mean for us now as we move forward in practical terms with developing tribal justice systems, with working across state/tribal/federal boundaries? What does this mean for clients and what does this mean for legal practitioners? In the interests of time, I have some prepared questions here so we're going to specify some of the individual panelists to receive a question, and then there will be a few questions that we're going to open up to all panelists. So, without further ado, if everybody is ready, we'll get started. The first question that we have is, from a practical standpoint, what, if any, differences do you see existing in terms of the approaches to criminal justice that has been taken by tribal justice systems as opposed to state and federal systems? I know that we have individuals on the panel who have presented cases before the Standing Rock Tribal Court and the Spirit Lake Tribal Court, and we have judges, we have public defenders, and former prosecutors. What is the biggest difference you've seen in criminal justice system responses?

Marjorie Kohls: We have to go back to how the tribal courts got set up, ignoring that they had courts thousands of years ago as means of solving disputes, but then the federal government set up the CFR courts and that was all a way to try and take the Indian out of the Indian and make them more European. They set up these original courts that were trying to be more European, or like the colonist courts. And it wasn't until, I think, 1934 that they were allowed to set up their own courts. By that time, they've been using

* A recording of this discussion can be found online at: <https://law.und.edu/library/cle/2022/ndlr-symposium.html>. This transcript has been edited and refined for readability and to reflect only the panelists that have agreed to be published.

these CFR courts for years, and I think there isn't that much difference. I worked in Burleigh County State Court and I've only worked at Standing Rock Court, so my experience is limited, but they follow most of the same procedures. We do the complaints, we do the arraignments, we set trial dates, and our code specifically says that if there's something missing, we go to the Federal Rules of Evidence and the Federal Rules of Civil Procedure, so our courts are just like the state courts.

Michelle Rivard Parks: Judge Vetsch?

Joseph Vetsch: Ours have been very similar as well, one thing I'd like to address was the *Cooley* case that Mr. Purdon talked about and, Spirit Lake anyway, is slowly on their way to solving the other side of that. Recently we entered into Special Law Enforcement Commission Agreements with, and I say we, technically the Bureau and the tribe, with the three sheriff's departments that touch our borders or have lands within our department: Benson, Eddie and Ramsey County. The Lake Region Narcotics Task force, the North Dakota Bureau of Criminal Investigation, Devils Lake Police Department, and we have an MOE in the works for the North Dakota Highway Patrol, which essentially allows them to enforce federal, state, and tribal laws on the reservation, depending on the fact pattern and defender. The flip side of that, a fix for *Cooley*, well, we don't need a fix anymore, but the easy way to solve the issue that comes with what follows *Cooley* and how far we take that, is the other way around, you make the special law enforcement commissions with the other agencies that are within your borders, but also cross-deputized the Bureau and our tribal law enforcement to enforce state laws within your borders as well. Maybe then we don't have that initial issue about, is the offender an Indian or non-Indian? And where are we at? Are we on fee land? On trust land? Are we still within the boundaries? That's a simple fix, a relatively simple fix. Fix one of those underlying issues then we're halfway there.

Michelle Rivard Parks: Ok, Miss Delorme, anything to add?

Breanna Delorme: From my practical experience standpoint, the biggest difference that I see between tribal court, state court, and federal court is in Spirit Lake. We don't have a specific evidence code. Our backdrop is the federal rules of evidence, but there's not any specific rules per se of evidence, and so in court we tend to agree with the federal rules but as a practical thing, there's not an actual evidence code as of right now.

Joseph Vetsch: Right, and that would be a step that's necessary to implement the Tribal Law and Order Act.

Michelle Rivard Parks: Which is a great segue to my next question, Judge Vetsch, the Tribal Law and Order Act has been most talked about because of enhanced sentencing authority, but before we move to a discussion on that, I would like to continue this discussion about

collaborations. Some of the provisions of the Tribal Law and Order Act called for improved communication between federal officials and tribal officials in terms of criminal justice system responses. Have you seen an improvement in that regard since the Tribal Law and Order Act went into place in 2010?

Joseph Vetsch: Yes, in some regards, and no in others. They do hold their regular MDT's with us which is, I think, a duty of the United States Attorney's Office, and they've been great about that. The U.S. Attorney's Office, I think, have been wonderful communicating with tribal law enforcement and tribal officials and our prosecutor's office. The disconnect comes, I think, not from a federal perspective, but it's the Bureau. We have a disconnect with the Bureau and sometimes tribal prosecutors or court systems, and sometimes even their federal counterparts. I don't know how to solve that issue. One of the problems is there is very little accountability. Tribes have very little accountability with Bureau law enforcement. So, if they don't communicate, they don't do their job, they don't share evidence. Depending on the nature of the case, we have very little authority to fix that problem. Even the United States Attorney's Office, it seems, has a little bit of an issue fixing that problem because they're a completely separate agency answering to a completely separate system of leadership. We've seen some improvements, but we've still got a long way to go as far as I'm concerned.

Michelle Rivard Parks: Anybody else have anything to add on the Tribal Law and Order Act? Would it be safe to say, just to kind of reiterate, with the Tribal Law and Order Act you've seen increased and improved communications between the US Attorney's Offices and the tribes, but with other federal agencies providing justice system services, such as the Bureau of Indian Affairs, there's still some work to be done?

Joseph Vetsch: Still some disconnect.

Michelle Rivard Parks: Okay. Now earlier in the panel's comments, we heard some discussion about state tribal collaborations, which we know are outside of the scope of the Tribal Law and Order Act, right? So generally, and I know with Spirit Lake you've mentioned that there have been some efforts made to improve state tribal collaborations on the law enforcement side, I'm interested to hear do you have similar things going on at Standing Rock with respect to state tribal collaborations on the law enforcement side?

Marjorie Kohls: Well, we're in South Dakota and North Dakota, and so it's completely different on both sides. In North Dakota we're cross-deputized, and we're actually the only law enforcement there, so we can stop people; we can stop everybody. But in South Dakota we're not cross-deputized and the council has even said they have no authority, the Corson County detectives have no authority over us. Sometimes they get involved and the cases get thrown out because the evidence is suppressed if they seize

it first. I don't know what the history of that is, why there's less cooperation in South Dakota, but it definitely depends on the state.

Michelle Rivard Parks: For our next question, I'm going to first ask Ms. Delorme for a response, and I think it builds off of where we're going. One of the things that I think has come up nationally in recent years pertains to the treatment of individuals by law enforcement officers. So, I want to ask that question, and I know we have some criminal defense attorneys on here, people with that background, so what do you think are the biggest issues that tribal members face when interacting with law enforcement? That's a loaded question.

Breanna Delorme: That is a very loaded question. So, I get a lot of clients who express to me they're concerned that if it's a non-Native officer arresting them, they have a harder time communicating with that officer, so they believe that the officer is just going to arrest them no matter what they say or how they try to explain themselves, the clients think that it didn't matter at the time, they were just going to get arrested and that was the end of it, whereas they believe if the officer was Native American, that the officer would listen to them so they explain the situation and potentially not necessarily be arrested. They might just give them a ride or something like that.

Joseph Vetsch: I'll speak to this one too. You're doing a good job of segueing from question to question.

Michelle Rivard Parks: Great, thank you!

Joseph Vetsch: Clearly, there's generations of distrust that have built up on both sides. There's the non-Native distrust of our court systems that we're still getting over the hurdle of and then there's, rightfully so, the Native American distrust of the white man's justice system and what they've been put through for generations and generations. Generational trauma does not go away. That type of generational distrust that you've been taught by your grandparents and by your parents, and you've literally experienced yourself once or twice, it's there and it's not going to be easy to get rid of. There's a panel called Racial and Ethnic Bias that's had some really interesting findings in regards to all ethnicities, but specifically with Native Americans. There is actually one coming up.

Michelle Rivard Parks: In May.

Joseph Vetsch: All of you would be invited to attend, and I think they're doing it via Zoom. It should be really interesting, a two- or three-day conference.

Michelle Rivard Parks: Anything else to add on the Standing Rock side that you've encountered?

Marjorie Kohls: I agree with him, actually the cops are all pretty good, but there is this inherent distrust and I get complaints that "oh he's picking

on me, you know he stopped me five times for driving without a license” and I’m like, “well, that’s because he knows who you are now.” So, they all know that they should get their Miranda rights read, but they don’t know the application. You know I tell them, “if the cop walks in while you’re stabbing somebody, he doesn’t have to read you your rights, you know.” It only depends on what you say, but then I also blame the education system. They have no concept that they’re allowed to say no when an officer asks “can I search your car?” They all go “okay”, and I yell at them. But you know, you can say no. When the cop is pounding on the door, you don’t have to let him in unless he has a warrant, but they don’t know any of that.

Michelle Rivard Parks: I’m going to bring it back to collaborative agreements such as cross-deputization agreements. The provisions and what’s included in those I think are usually pretty standard, right? We’re looking at what is the liability associated with law enforcement. They usually carve out jurisdictional authority. Do you think that the framers of those documents should be including provisions such as cultural competency training for law enforcement or such as the history of tribal law or law enforcement?

Breanna Delorme: I think that it would be extremely beneficial. Especially if you’re cross-deputizing a Sheriff’s Department where most of the people in your Sheriff’s Department are white, they may not necessarily understand that fundamental distrust that we have seen for generations, so having that background and understanding of how to communicate and be patient and asking a couple of extra questions to make that individual that you’re detaining comfortable so that they’re not going to resist or try to run away, I think that would be very beneficial.

Michelle Rivard Parks: All right, we’re sticking with the Tribal Law and Order Act for just a few more minutes here. Another question that I have for you all as system practitioners is beyond collaborations, another aspect of the Tribal Law and Order Act was enhanced sentencing authority. So, for those in the audience, in the Tribal Law and Order Act one of the things that it did was amend some provisions of the Indian Civil Rights Act, and essentially, tribal courts can, for certain qualifying convictions or cases and if they have certain components within their tribal justice systems, those defendants, if convicted, can be subject to higher or enhanced sentences. How important do you think that authority is for tribal justice systems in light of the kinds of criminal activities you’re seeing in tribal communities?

Marjorie Kohls: It doesn’t really apply to us because we don’t get the major crimes. If there’s a major crime, the feds come in and take it, and there are other requirements about the quality of your jail if you’re going to keep them there that long, and our jail does not come up to those standards, so we have not enacted the enhanced sentencing.

Michelle Rivard Parks: You have not implemented it, correct?

Marjorie Kohls: Right.

Michelle Rivard Parks: Ok, but I'd still be interested to hear your opinion. Do you think that enhanced sentencing authority is important in general for tribal courts to administer justice?

Marjorie Kohls: I'd say no, but I'm not an expert on that field because we haven't been using it.

Joseph Vetsch: Well, we're not using it either. We're close. We put a few things in place. We've got licensed prosecutors and licensed defense attorneys. We have a place to house the long-term contract placements off Spirit Lake, but our long-term people who get six months to a year, or sometimes three years if we stack up sentences, are housed in places off the reservation now with contracts, so we're close. But I think the answer to the question, in our opinion, certainly is yes. There are certain offenses that, for whatever reason, it may be tougher to get a conviction in federal court, but if you've got a situation where somebody sexually abused a child, and for whatever reason, maybe there is a mess up in evidence collection that you can get by in tribal court that's not going to fly in federal court, maybe the search warrant didn't live up to federal court standards, but it's going to fly in your tribal court, or the evidence just isn't strong enough to convince a federal prosecutor to take it, well, that case deserves more than a year, right? That case deserves more than three years, but if we can change that sentencing even from one to three and stack three times three, depending on the nature of the offense, we'll gladly take it. That's giving your tribe the ability to administer at least a semblance of justice beyond what we currently can do. I'd say it's very important.

Breanna Delorme: And to expand on his answer, I think one of our biggest areas where we could really use that is for domestic violence convictions. A lot of the feds won't take our domestic violence perpetrators, even if they're a habitual offender, because they don't believe that the victim is going to cooperate, or if the victim has expressed that they're not going to cooperate with a federal prosecutor, but we might end up getting a tribal conviction because they're more comfortable in a tribal court presenting their side of the story in front of members of their community, rather than going all the way down to Fargo to testify in front of a whole bunch of people that they have never experienced before.

Joseph Vetsch: And then another thing with this as well, many times if the federal government feels like justice can be administered, it is administered sufficiently in tribal court. They will say that we've oftentimes had cases adjudicated in tribal court before the feds take it, and if it was adjudicated and the punishment was sufficient, they will oftentimes say "good enough for us." Saves them the work and it kind of allows the tribe to

take back some of that inherent sovereignty, administer their own justice. That's the other reason it would be sufficient, you could put somebody in jail for three to nine years for a serious crime. They may very well say "we're good with that."

Michelle Rivard Parks: Well, and I'm glad you mentioned domestic violence in your comments because that is another fabulous transition. I know there's been some discussion today on the special tribal criminal jurisdiction in light of VAWA 2022, and I know this is a really big issue that's been sitting around for a long time is this VAWA reauthorization, so this is certainly a time for celebration across much of Indian country in terms of that being reauthorized. My question to you is with these provisions, which I believe were outlined by Professor Christianson this morning, with the new crimes that were listed, how important do you feel that those defined crimes are for improving the ability of tribes to respond to these kinds of crimes?

Marjorie Kohls: I think they are. I know, especially in child abuse, because the problem before was you could go and beat up your wife and beat up your kids, and we could only prosecute you for beating up your wife. I really like the part where they can't assault judicial officers because that protects me. But I think now again we have enhanced sentencing which we can't implement, and we have a problem with the juries because we don't even know how to get a jury of non-members, we always use our membership list, but we're working on it.

Joseph Vetsch: I think there's still work to be done in that area though, in restoring tribal sovereignty, so you left out a whole list of misdemeanor crimes that a non-Indian could perpetrate on an Indian, that leaves that non-Indian exclusively within the federal government prosecution authority: simple assault, petty theft, criminal mischief, non-Indian damages an Indian's car. The federal government has a lot on their table. We already see relatively high prosecution declination rates. Imagine throwing 100 of those at the Federal US Attorney's a year out of Spirit Lake, or another 100 out of Turtle Mountain. Now, that's one or two a week that's not unheard of. We actually don't have that problem in Spirit Lake. Strangely enough, we don't see a lot of that, and we have, I don't know if it's legal or not, but what we have going on in that realm is the county prosecuting those cases. Always have, continue to do it, nobody says anything about it. I think part of the reason nobody says anything is because the tribe is happy about it. The county, for some reason, is willing to do it, and the non-Native defendant isn't going to argue because they don't want to get stuck in federal court. They'd much rather be in a friendly county court. So, that's our current solution to that problem.

Michelle Rivard Parks: And you're talking about the commission of a crime by a non-Indian against a tribal member for one of these non-defined major crimes and one of these non-defined VAWA crimes?

Joseph Vetsch: Yeah, my reading of the federal, our little crime chart, or jurisdictional chart says that's exclusively federal. No argument about it, and those crimes are currently running through our county courts, and word is, it's happening up in Turtle Mountain too. It's been well known.

Marjorie Kohls: Too late now.

Joseph Vetsch: It's been well known and nobody made an issue out of it. Having said that, we shouldn't have to bend the law to get justice.

Michelle Rivard Parks: One of the issues I think that has come up time and again, whether we're talking about the discussions that happen leading into the VAWA reauthorization or the discussions around tribes prosecuting and adjudicating cases, criminal cases over non-Indians, have been infrastructure, right? And you referenced that at Standing Rock that's been one of the factors, or hurdles, that must be overcome. That these laws, Tribal Law and Order Act, the special tribal criminal jurisdiction they require certain components within the tribe's infrastructure, and some of which are expensive. One of which is legal representation. Just in a general context, what do you think are the major barriers to the provision of legal representation to indigent defendants in tribal court?

Marjorie Kohls: When you think of where the reservations were set up, and why they were set up there, they're far, except for Tulsa, but normally they're far away from big cities and people have to travel a long way, and tribes can't afford to pay for that. People don't necessarily want to move. I live in Bismarck and it's 72 miles from my house to get to work, and not everybody wants to do that, and I think that's part of the problem in getting personnel. Now we're lucky we have two wonderful public defenders, including me, but we're having trouble getting prosecutors and we're having trouble getting judges.

Michelle Rivard Parks: So, demographics is an obstacle to being able to attract qualified candidates to provide legal representation and fill these positions?

Marjorie Kohls: Right. We have two good judges right now, and they're both Indians and they both live there, and that's ideal. I mean, if they wanted to replace me with a qualified, Native candidate, I'd understand because they want Indians to represent them, but that's not always possible. We have to encourage more Native Americans to go to law school.

Michelle Rivard Parks: Any other challenges to the implementation of either this special jurisdiction or enhanced sentencing authority that are making it difficult? Because I believe everybody on the panel, the tribes that you've worked with, have not implemented either, to your knowledge. Is there a particular reason?

Marjorie Kohls: Well, if you're talking about us, we've implemented VAWA, but I think we've had three cases in the last five years. That's

because we're not one of these reservations where 50% of the people living there are non-Native, it's mostly Native, and so if you go to someplace like Sisseton, it might be different.

Michelle Rivard Parks: Right. Judge Vetsch I see the wheels are turning right now.

Joseph Vetsch: I'm trying to decide how to word the answer that I have. With us, I think it's going to be relatively easy enough to do once we decide to do it, but honestly, I felt like before we jumped into that we need to shore up some other things. We needed to get licensed people, which wasn't as easy as you would think, and when we have job advertisements, we don't exactly have six people applying for them. That job will sit there for six months, and you'll get one or two applicants, and you'll hire the first one instantly. So, you don't have a lot, and the worry would be you go through all the steps to implement this, and then, well, we've got two licensed public defenders now, but you lose the two. And then what do you do for six months? You've gone through all that trouble, so we're trying to shore up the little things first. You know we got a new criminal code, working on rules of evidence, but want to make sure you're comfortable in your own justice system before you take that next step, and it sounds like it should be an easy thing to do, but it's not. You've watched us progressing, baby steps, and I think it's taken us nearly 20 years to get to a point where we're close to being able to take on a big project like that, and we're still not there, but I'm hoping we'll get there sometime.

Michelle Rivard Parks: The other question that I would like to ask you is: are there any types of reform that you believe is necessary to improve community safety in Indian country and outcomes for Native American court involved individuals?

Joseph Vetsch: I got one, this one is for the real deep thinkers, like Grant Christensen, and the people who've been in the system before. We've got a unique situation in Indian country where, let's say, an FBI agent leads an investigation, and he's the one who gathers the evidence and, for whatever reason, the Bureau or the tribal guy is not along when it happens, and this moves up the chain to the US Attorney's Office and the tribe's got the case on their table, right? And the evidence is in the hands of the federal government who refuses to give it up. And you give a subpoena, if you really want to have this fight, you subpoena the FBI agent to come to your court. That's not going to fly, right? Doesn't fly. Everybody laughs at it because, good luck. This isn't a fight you want to pick; you're essentially suing the federal government. Here's the underlying problem with that: if you've got a defendant in tribal court who's represented by Breanna here, and she knows there's a bunch of evidence out there that she can't get her hands on, she has no idea if it's exculpatory. It doesn't matter what she does, she's not going to

be able to get that out of them. The solution to that, I think, is to try this one more time given our current federal courts and our current Supreme Court, and the argument is: you are denying my client due process and equal protection, and in my mind, it is race based. They'll tell you the Indian is not race based, it's political, but it's time to have that fight again and, even if you don't change the case law, at least maybe get the federal government to change their policies in that regard. We had one FBI agent, maybe two, when I was a prosecutor who said, "I'll go to court for you," and they've showed up and testified, but other than those two which was a very rare occurrence, we can't get FBI agents to come into our court, and we can't get our hands on their evidence. If we're going to get our hands on their evidence, it's got to come through one of our officers who essentially tagged along and collected it himself. That's a big reform I'd like to see in tribal justice systems. Not only for the tribes themselves, but for the poor defendants who are being prosecuted in tribal court.

Michelle Rivard Parks: So, you would like to see the Tribal Law and Order Act of 2010 revisited, perhaps, for a little stronger language with respect to FBI?

Joseph Vetsch: Sure, and if somebody like Kaplan wants to take up that fight.

Michelle Rivard Parks: He's schlepping legal work up here.

Joseph Vetsch: It seems like a no brainer to me; you've got what I feel like is a race-based classification, and its equal protection and due process. Two big ones. I can't understand how you can reason yourself to withholding that kind of evidence from a criminal defendant in federal court or in tribal court.

Breanna Delorme: And usually what happens is the prosecutor ends up giving a really good deal, and then the case closes, and I can't have my fight.

Michelle Rivard Parks: We've had a lot of discussion here today on federal law, which is important of course, but I would like to know the opinions of this group on a trend and a movement across Indian country, and we, at the Institute, work with a lot of tribes in the lower 48 and Alaska, and tribal courts planning in particular, tribal justice system planning, there's been a lot of discussion about moving away from things like jail time and fines and moving towards more culturally based practices that are rooted in restoration and victim healing as a better means to effectuate community safety. I'd like to know what your thoughts are on that, and if you're experiencing that.

Marjorie Kohls: Especially for non-violent crimes, I think the whole public shaming in the inner circle is a good idea. Right now, it's kind of a symbol that you've finally reached manhood or something when you get to go to jail, and I think we could do away with that. Now for violent crimes, I

think we have to stick with what we're doing, and as a public defender, I'm trying to get them out all the time, but you do see repeat offenders, people that have domestic violence that do it six times. So, I think it depends on the issue. If you steal money from the grocery store, you should have to work to pay it back. I'm a great believer in community service.

Michelle Rivard Parks: Judge Vetsch, do you have anything to add to that?

Joseph Vetsch: I think the underlying concept of restorative justice has got some steam rolling nationwide in various places, but specifically in tribal courts, and I wouldn't mind exploring it almost as an alternative to incarceration. However, whether it's some kind of program that you have that's predisposition and/or post-disposition, but if you fail at it or you don't follow through with whatever it entails, and honestly, I don't know a lot about what these systems entail, but I still feel like you have to have the ultimate consequence of potential jail time. My personal opinion, without knowing much about it.

Breanna Delorme: I think in our community that we work in the most beneficial would be for juvenile offenders who are addicts because they would get that rehabilitation aspect, but also have a little bit of jail time over their head to ensure that they're following through with committing to whatever program, and if it's a pretrial diversion program, or something similar, it would probably be the most effective because then you do have real consequences on the back end if you don't follow through. If you think you're mature enough to use methamphetamine, then you should be mature enough to go through some sort of program, whether it's a traditional court or restorative justice, or learning more about your history and what justice looked like 100 years ago versus now, and why that generational trauma is now affecting you as a teenager, and learning those kind of concepts I think would be very beneficial, especially teenagers who use methamphetamine.

Marjorie Kohls: And can I just add the problem is funding. All those programs involve more people, more patience, and working with people. And it's easier and cheaper to just store them in jail.

Michelle Rivard Parks: Great, and I think that builds off of Ms. Shanley's comment earlier in talking about the implications from *McGirt*, and building tribal capacity to respond to crime and to adjudicate cases and civil and family matters that there is a monetary aspect that still also needs some resolution, and some of that resolution might be rooted in the trust responsibility to invest in those infrastructures as well. Well, those are all the questions that I have for today's panel, and I want to thank you all for being with us today. I also want to thank the Law Review representatives who pulled together today's agenda. It's been a really good day for everyone. For those of you who are joining us here today, and those of you who are joining

us virtually, just a couple of quick points if you are interested in learning more and having a further discussion about this. We would certainly encourage you to reach out to any of the panelists today. We would also like to point out that there will be more information coming out for the National Consortium on Race and Bias panel. They will be here in Grand Forks in May of this year, so we would encourage people to participate in that discussion, which will include some specific discussions around Native American individuals. The other thing that we will have come up is, this will be a shameless plug on my part, the Tribal Judicial Institute, which is a training and technical assistance provider housed here at the University of North Dakota School of Law. We work with Department of Justice funding to provide training and technical assistance to tribes across the lower 48 and Alaska. One of the main events that we work with other training and technical assistance providers across the country to host the annual American Indian Justice Conference. So, if any of you have an interest in these issues and particularly learning more about emerging issues that are facing tribal communities, tribal justice systems, some of the promising practices in this area, we would encourage you to reach out to us. We anticipate that event will be hosted virtually this year in June, and hopefully next year we will be back to an in-person event, so we would definitely invite you all to be on the lookout for that. We just would like to thank everybody for having us today and wish you well on your travels home, or in turning off your computer.