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COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION III

TATUM ACEVEDO
Appellant

v.

BRANDI JORDAN, STEVE JORDAN, AND ANTHONY JORDAN
Respondents

AMICUS BRIEF ON BEHALF OF CENTER OF INDIGENOUS
RESEARCH AND JUSTICE, THE CENTER FOR INDIAN LAW AND
POLICY, AND THE KALISPEL TRIBE OF INDIANS

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INTEREST OF AMICI

The Center of Indigenous Research and Justice (“CIRJ”) is a non-profit organization affiliated with the Native American Law Center at the University of Washington School of Law. CIRJ provides legal services to low-income Native American individuals, with an emphasis on serving juveniles. Additionally, CIRJ conducts research on Native American law and policy. CIRJ does not, in this brief or otherwise, represent the official views of the University of Washington.

CIRJ is interested in the above captioned matter because the case involves questions of applicability of the Indian Child Welfare Act and the Washington State Indian Child Welfare Act. This Amicus Brief provides the Court of Appeals with specific technical information on the applicability of the Indian Child Welfare Act and the Washington State Indian Child Welfare Act in this case. Additionally, this Amicus Brief discusses the special issues related to being a minor parent navigating child custody proceedings.

The Center for Indian Law & Policy (“CILP”) at Seattle University School of Law is dedicated to educating the next generation of Indian law attorneys by providing educational opportunities for students and practitioners. CILP works with tribes and tribal attorneys providing them with information, training and support they need to be successful in

improving the quality of life throughout Indian Country. CILP also oversees a student-run American Indian Law Journal, oversees tribal judicial clerkships, assists tribes and attorneys in drafting and revising tribal codes and constitutions, provides continuing legal education to bench and bar on Indian law topics, hosts public forums and events highlighting existing and emerging issues in Indian Country, and oversees the most extensive Indian and tribal law curriculum in the Pacific Northwest.

CILP is interested as signatory to this amicus because it asserts the application of ICWA. The Center takes the position that ICWA fulfills its purpose of recognizing each Tribe's inherent sovereignty over the upbringing, education and protection of the next generation of its members and leaders. The Center for Indian Law & Policy does not, in this brief or otherwise, represent the official views of Seattle University.

The Kalispel Tribe of Indians, a federally recognized tribe, has a key interest in this matter. The Tribe has reservation lands in Spokane County and Pend Oreille County, and Tribal Members throughout the country. The Tribe believes that both ICWA and WICWA should be applied to third party custody situations when an Indian child is involved. Under ICWA and WICWA, the Tribe should receive notice of such proceedings, and the child's parents should be receiving protections

and services under these laws. The trial court's decision in this case is in a venue which will likely hear cases involving Kalispel Tribal Members. If provided notice, the Tribe has its own Indian Child Welfare department which can provide support to Indian families and qualified expert witness testimony in hearings. As such, it is imperative that the Court finds that ICWA and WICWA applies in these situations.

STATEMENT OF THE CASE

In 2013, Ms. Acevedo gave birth to N.J. when she was fourteen years old. In 2015, when she was fifteen, Ms. Acevedo entered into a Non-Parental Custody Order with the child's paternal grandparents (who have since divorced), Mr. Steve Jordan and Ms. Brandi Jordan. In 2017, having achieved an admirably stable life at a young age, Ms. Acevedo filed a motion to have her child returned to her and vacate the Non-Parental Custody Order. That motion was denied. Ms. Acevedo appeals the denial of the order

ARGUMENT

I. CONGRESS DRAFTED ICWA TO PROTECT PARENTS IN PRIVATE ACTIONS.

Congress passed the Indian Child Welfare Act (ICWA), 25 U.S.C. §§ 1901 et. seq., in 1978 to protect Indian children from unnecessary removal from their parents. 25 U.S.C. § 1902. ICWA creates a federal framework which establishes minimum standards applicable in all proceedings involving the removal or placement of Indian children. *Id.* Congress drafted ICWA after an extensive congressional investigation into abusive Indian child welfare policies and practices.

A. Congress included private proceedings in the Indian Child Welfare Act to protect parents and Tribes.

Following four years of investigation and hearings, Congress passed ICWA to remedy abuses and “protect the rights of the Indian child as an Indian and the rights of the Indian community and tribe in retaining its children in its society.” H.R. Rep. No. 95-1386 at 23 (1978). To protect the rights of Indian children and their parents, Congress drafted ICWA to include *both* voluntary and involuntary proceedings initiated by either public agencies or private parties. *See* 25 U.S.C. § 1901(4) (finding that “that an alarmingly high percentage of Indian families are broken up by the removal, often unwarranted, of their children from them by nontribal

public and private agencies”). Congress clearly expressed its intent that ICWA cover private third-party child custody proceedings in addition to state-initiated proceedings. *See* 25 U.S.C. § 1913 (addressing the rights of parents and providing for procedures in voluntary proceedings).

The legislative history demonstrates Congress’ intent for ICWA to cover private child custody proceedings. Four years of testimony, hearings, and debate in front of both bodies of Congress brought to light the appalling practices used by state agencies and private parties to remove Indian children from their parents and tribal communities. *Miss. Band of Choctaw Indians v. Holyfield*, 490 U.S. 30, 32, 109 S.Ct. 1597, 104 L.Ed.2d 29 (1989). William Byler, the executive director of the Association of American Indian Affairs, testified that parents were tricked or coerced into signing voluntary waivers of parental rights without legal counsel or even an understanding of the implications. Parents voluntarily agreed to give their children away because of a lack of informed consent, or fraud and duress. Congressional reports contain numerous accounts that led Congress to include language in ICWA’s final version that covered private proceedings, requiring a court process for those private placements. *Problems that American Indian Families Face in Raising their Children and how these Problems are Affected by Federal Action or Inaction: Hearings Before the Subcomm. on Indian Affairs of the S.*

Comm. On Interior and Insular Affairs, 93rd Cong. 2nd Sess. at 20-22 (1974) (statement of William Byler, Executive Director of the Association of American Indian Affairs) (“1974 S. Hearings”).

B. States expanded ICWA protections to private proceedings through legislation and case decisions.

In the forty years since its enactment, additional state level legislation and case law interpretations have extended ICWA’s protections and procedural requirements. To achieve uniformity in application, states enacted their own state ICWA laws to further ensure the protections guaranteed to the parents of Indian children.

The Washington State Indian Child Welfare Act (WICWA) is one example of this type of legislation. *See* RCW §§ 13.38.010-13.38.190 (2011). The Washington legislature created WICWA to mirror ICWA’s provisions and facilitate uniform application within Washington state courts. William N. Smith and Richard T. Okrent, *The Washington State Indian Child Welfare Act: Putting the Policy Back into The Law*, 2 Am. Indian Law J. 146 (2013). The Washington legislature intended WICWA “to prevent out-of-home placement of Indian children that is inconsistent with the rights of the parents...” and to clarify existing laws. RCW §13.38.030. The statutory language of WICWA states that the act shall apply in all custody proceedings involving an Indian child. RCW

§13.38.020. Conflicts between the provisions of the state act and other Washington child custody legislation is to be resolved in favor of applying WICWA. *Id.*

WICWA also extends ICWA’s protections by vesting petitioners in private placement proceedings with the same duty to provide remedial actions and active efforts as state agencies. Smith & Okrent, *The Washington State Indian Child Welfare Act: Putting the Policy Back into The Law*, 2 Am. Indian Law J.at 161; RCW §13.38.040 (1)(b). WICWA’s extension of “active effort” requirements to private party petitioners, who have no statutory duty to provide services under ICWA, demonstrates the legislature’s intent to extend the protections of ICWA to private proceedings. RCW §13.38.040 (1)(b).

In *In re Adoption of T.A.W*, the Washington Supreme Court applied WICWA and ICWA to a private proceeding brought by the biological Indian mother to terminate the rights of the non-Indian biological father. 186 Wn.2d 828 (2016). In *T.A.W.*, the Supreme Court held both WICWA’s and ICWA’s protections applied to the non-Indian father. *Id.* at 844, ¶ 33. When deciding in a private petitioner-initiated proceeding like *T.A.W.*, the Supreme Court held that “active efforts” requirement also applied. *Id.* at 852, ¶ 50.

Other states have adopted similar reasoning in interpreting ICWA

and state ICWA laws. The Oklahoma Supreme Court interpreted ICWA protections to apply to an intra-family private custody dispute involving an Indian child. *In re Matter of Guardianship of Q.G.M.*, 808 P.2d 684 (Okla. 2015). (ICWA applies to a grandparent guardianship and the tribe had a right to intervene in the private dependency proceeding.) In *Empson-Laviolette v. Crago*, 760 N.W.2d 793 (Mich. Ct. App. 2008), the Michigan Court of Appeals reached a similar conclusion. *Empson-Laviolette* involved guardianship and custody proceedings between temporary guardians and the biological mother. *Id.* at 796. The temporary guardians of the Indian child filed petition for custody, and the biological mother filed a motion to dismiss under ICWA. *Id.* The Michigan Court of Appeals held that guardianship proceedings classified as “foster care placement” under ICWA, and the voluntary nature of the guardianship agreement did not remove it from ICWA’s purview, if the mother could not have the child returned upon demand. *Id.* at 799.

Across the nation, courts have interpreted ICWA’s language to apply to private child custody proceedings. *See In re Adoption of Micah H.*, 887 N.W.2d 859, 867 (Neb. 2016) (ICWA applied to private adoption case brought by maternal grandparent guardians), *S.S. v. Stephanie H.*, 388 P.3d 569, 573 (Ariz. App. 2017) (ICWA applies to any petition to sever parental rights over an Indian child), *In re N.B.*, 199 P.3d 16, 19 (Colo.

App. 2007) (ICWA applies to private stepparent adoption), *In re J.C.T.*, 176 P.3d 726, 728 (Colo. 2007) (ICWA applies to private guardianship proceeding), *In re Custody of S.B.R.*, 43 Wn. App. 622, 625 (1986) (An involuntary proceeding involving an Indian child, including intrafamily custody disputes, is governed by the ICWA). In these cases, the courts' interpretations reflect both congressional and state legislative intent to apply ICWA to all child welfare proceedings where an Indian child is placed outside of his or her home.

II. APPLYING ICWA AND WICWA TO CHILDREN WHO ARE ELIGIBLE FOR MEMBERSHIP IS THE ONLY WAY TO ALLOW THE FULL PROTECTIONS OF THE LAW DURING CHILD CUSTODY PROCEEDINGS.

ICWA defines "Indian child" as a child who is either an enrolled member of an Indian tribe *or* who is eligible for enrollment and the biological child of an enrolled parent. 25 U.S.C. § 1903(5); 25 C.F.R. § 23.2 (2016). Similarly, WICWA applies to Indian children who are eligible for membership in a federally-recognized Indian tribe. *See* RCW § 13.38.040(7); *see also In re L.N.B.-L.*, 157 Wn. App. 215, 241(2010) (holding that neither ICWA nor WICWA required that a state court provide notice to a tribe that was not federally-recognized).

As sovereigns, Indian tribes have the sole discretion to determine who is eligible for membership in their tribe. *See Santa Clara Pueblo v.*

Martinez, 436 U.S. 49, 72, n. 36, 98 S.Ct. 1670, 56 L.Ed.2d 106 (1978) (“A tribe's right to define its own membership for tribal purposes has long been recognized as central to its existence as an independent political community.”). In applying ICWA and WICWA, Washington courts do not “go behind the internal decision-making process of the tribe” to determine who is eligible for membership. *In re Dependency of A.L.W.*, 108 Wn. App. 664, 671 (2001).

A. Tribal Governments and Congress understand that children who are eligible for membership have a relationship with their tribe that has not yet come to fruition, but must still be protected.

Many Indian children live outside of the exterior boundaries of their reservation. According to the U.S. Census in 2010, approximately 67% of American Indians live outside of the exterior boundaries of their tribe’s reservation. United States Census Bureau, *The American Indian and Alaska Native Population: 2010* 13 (2012), <https://www.census.gov/history/pdf/c2010br-10.pdf>. Historically, government programs forced American Indians off their lands. Federal and state governments removed many American Indian children from their homes and sent them to boarding schools around the country during the 19th and early 20th centuries. Margaret Jacobs, *A Generation Removed:*

The Fostering and Adoption of Indigenous Children in the Postwar World xxxii-xxxiv (2014).

In the middle of the 20th century, the federal government began a relocation program that displaced many American Indians by relocating them to large urban areas, including Seattle, and away from their reservations. *Id.* at 8-9. While hearing testimony on and developing ICWA in the 1970s, Congress contemplated the reality that many American Indians did not live on their tribal lands.

Congress had to consider how tribes establish tribal membership, especially when an eligible child may live far from home. Congress also heard testimony that prior to ICWA, many Indian children in at least one state foster care system who were eligible for tribal membership were not likely to later enroll as members. 1974 S. Hearings at 223, 252 (comments submitted by Colville Confederated Tribes Chairman Mel Tonasket, President, Nat'l. Cong. of Amer. Indians). One reason children eligible for membership and in foster care were not enrolled was because pre-ICWA confidentiality rules created problems for the family attempting to enroll a child while in state care. *To Establish Standards for the Placement of Indian Children in Foster or Adoptive Homes, to Prevent the Breakup of Indian Families, and for Other Purposes: Hearing Before the U.S. S. Select Comm. on Indian Affairs, 95th Cong. 1st Sess. at 426 (1977)*

(report by Charlotte Tsoi Goodluck and Flo Eckstein, Jewish Family & Children’s Serv. of Phoenix) (“1977 S. Hearing”). In addition to contemplating tribal membership for children in foster care, the Senate heard testimony that Indian children previously adopted outside of their tribal communities needed a way to connect with their tribes. *Id.* at 84 (statement of Nat’l. Cong. of Amer. Indians).

Today, ICWA’s policies continue to reflect Congress’ contemplation of the importance of tribal membership. The BIA’s ICWA Regulations, 25 C.F.R. pt. 23 (2016), acknowledge that tribes have a unique relationship with Indian children who are eligible for membership, even in private dependency proceedings. The Regulations require that when a party seeking foster care placement of an Indian child has reason to believe the child may be an Indian child, it must send notice to the relevant tribes. 25 C.F.R. § 23.124. Accordingly, the Regulations highlight that a child who is not yet a tribal member should receive ICWA’s protections inasmuch as determining their eligibility for membership—as part of the ongoing child welfare proceedings.

B. The nature and length of child welfare proceedings means that children eligible for membership may become members during the pendency of the proceedings.

Generally, all child welfare proceedings are lengthy proceedings that can last from anywhere from 12 to 24 months. Child welfare

proceedings require considerable time because courts must thoroughly weigh the complicated questions of a parent's fundamental right to parent and the child's best interests. *Troxel v. Granville*, 530 U.S. 57, 67, 120 S.Ct. 2054, 147 L.Ed.2d 49 (2000). However, the determination of a child's status as an Indian child is something that must happen at the outset of the proceedings when the party seeking foster care placement has reason to believe the child is an Indian child. 25 C.F.R. § 23.124; RCW § 13.38.050.

Through the notice provisions, both ICWA and WICWA require notice to the Indian tribe where a child may be eligible for membership. 25 U.S.C. § 1912(a); RCW § 13.38.050. When the state notifies an Indian tribe that an Indian child is at the center of child welfare proceedings, a tribe may determine whether the child is eligible for membership and begin the process of enrolling the child. Identifying a child's tribal membership may be an ongoing process. Specifically, WICWA allows for re-determination of a child's Indian status at any point during the proceedings. RCW § 13.38.070(4)(a).

Child custody proceedings have many stages, and the tribal enrollment process may require some time. However, Congress addressed this process directly in enacting ICWA: "The constitutional and plenary power of Congress over Indians, Indian tribes and affairs cannot be made

to hinge upon the cranking into operation of a mechanical process under tribal law.” H.R. Rep. No. 95-1386, at 17 (1978). Because of the length of time required to complete a child welfare case, it is very likely that a child who is eligible for membership will become a member while the case is ongoing. And accomplishing this enrollment process may be particularly difficult for the minor parents of Indian children.

C. Children of minor parents may not receive the protections of ICWA and WICWA given the work required of the minor parent to enroll her child in a tribe.

Sometimes, children who are eligible for membership and already removed have a baby who will also not be enrolled, creating lost generations of children. In *In re Miguel S.*, 203 Cal.Rptr.3d 312, (Cal. Ct. App. 2016), the California Court of Appeals heard the case of a minor parent in foster care. The minor mother was eligible for enrollment in two Indian tribes. During proceedings for the termination of her parental rights over her two children, she told state officials she believed she was a Native American. *Id.* at 315. The state identified the two tribes where she may be eligible for enrollment, but because she did not appear and decide where to enroll herself—and consequently her children—the court declined to apply ICWA and terminated her rights. *Id.* Later, the California Court of Appeals held that not applying ICWA was an

improper decision since both the minor parent *and* two children at issue were eligible for enrollment. *Id.* at 318.

Cases involving a minor parent who is herself an Indian child places a great onus on minor parents. Because of displacement and the prevalence of Indian children in the foster care system, many minor parents may not even understand their own status as a tribal citizen, let alone the process of obtaining tribal citizenship for their children.

III. MINOR PARENTS DESERVE THE ADDITIONAL PROTECTIONS THAT ICWA PROVIDES TO ALL PARENTS OF INDIAN CHILDREN.

The Fourteenth Amendment of the Constitution protects the right to control the care and custody of one's child. *Troxel v. Granville*, 530 U.S. at 67. Unlike other rights, the right to parent is not limited by a parent's age of minority. Emily Barry, *Babies Having Babies: Advocating for a Different Standard for Minor Parents in Abuse and Neglect Cases*, 39 *Cardozo L. Rev.* 2329, 2337 (2018). And minor parents are held to the same parenting standards as adults, with no consideration to their *own* status as children. Eve Stotland & Cynthia Godsoe, *The Legal Status of Pregnant and Parenting Youth in Foster Care*, 17 *U. Fla. J. L. & Pub. Pol'y*, 1, 3 (2006).

Therefore, minor parents are at an unfair disadvantage in the child welfare system. Minor parents are more likely to come into contact with the child welfare system than their adult counterparts. Barbara Glesner Fines, *Challenges of Representing Adolescent Parents in Child Welfare Proceedings*, 36 U. Dayton L. Rev. 307, 310 (2007). Furthermore, minors are more impulsive and impressionable than adults and less capable of appreciating the long-term consequences of their decisions. Petronella Grootens-Wiegers, et al, *Medical Decision-Making in Children and Adolescents: Developmental and Neuroscientific Aspects*, 17 BMC Pediatrics 120 (2017). For these reasons, almost every other area of the law offers extra protections to minors. In a similar vein, minors deserve extra legal protections when encountering important long-term decisions affecting their children.

A. Minor parents, due to an increased likelihood of coming into contact with the child welfare system, are held to a higher standard of parenting than adult parents.

Minor parents are more likely than adults to have their children come under the jurisdiction of the courts. Fines, *Challenges of Representing Adolescent Parents*, 36 U. Dayton L. Rev. at 310. One reason is that minors are more likely to come into contact with mandated reporters of child abuse, such as teachers or caseworkers. *Id.* at 311. This is partially due to the fact that minor parents are more likely to rely on

public assistance than adult parents. *Id.* at 313. Minor parents are more likely to be in poverty, and having a child only increases a parent's financial difficulties. *Id.* at 309. In some states, public assistance is conditioned on home visits from caseworkers. *Id.* at 313.

Furthermore, minors in foster care, who are themselves already subject to a high level of scrutiny from the child welfare system, are more likely to become parents than other minors. Stotland & Godsoe, *The Legal Status of Pregnant and Parenting Youth in Foster Care*, 17 U. Fla. J.L. & at 3. Consequently, minor parents in foster care are far more likely to have their children removed than other parents. *Id.* A minor parent in the foster care system is constantly subject to the scrutiny of social workers and foster parents and is more likely to be reported for suspected mistreatment as a result. *Id.*

While foster children themselves are wards of the state, the child of a foster child is not. *Id.* Babies born to adolescents in the foster system remain in the physical and legal custody of their birth parents. *Id.* at 10. Oftentimes, minor parents in the foster care system are coerced into relinquishing rights to their children by caseworkers who automatically equate young age with risk of abuse or neglect. Fines, *Challenges of Representing Adolescent Parents*, 36 U. Dayton L. Rev. 310-11. When compared to mothers between the ages of twenty to twenty-one, mothers

under the age of sixteen are twice as likely to have their children removed. *Id.* at 310. Mothers between the ages of eighteen and nineteen are one-third more likely to have their children removed. *Id.*

B. Minors, while capable of making important decisions, have not achieved full brain development, which creates a heightened need for ICWA and WICWA's protections.

Minors generally possess the same capacity as adults to make informed decisions about important issues. Grootens-Wiegers, et al., *Medical Decision-Making in Children and Adolescents*, 17 BMC Pediatrics 120 (2017). However, an adolescent's decision-making ability is vulnerable to impairment due to environmental factors. *Id.* at 8. Adolescent brains are not fully developed, rendering them more susceptible to peer pressure and risky behavior. Barry, *Babies Having Babies*, 39 Cardozo L. Rev. 2341. Between the ages of twelve and fifteen, adolescents experience significant cognitive, emotional, and physical development. *Id.* at 2340. Studies show that children as young as nine years old have the capacity to make informed decisions, and children between the ages of fourteen and fifteen possess the same decision-making capacity as adults. Grootens-Wiegers, et al., *Medical Decision-Making in Children and Adolescents*, 17 BMC Pediatrics 120. However, while adolescents possess the same *capacity* as adults to make informed

decisions, adolescents are more vulnerable to situational factors which may hinder their *competency* to actually reach an informed decision. *Id.*

Decision-making ability in adolescents is especially affected in high-pressure and emotional situations. *Id.* A minor is far more likely to exhibit risk-taking behavior, and their ability to see the past short-term consequences of their decisions is inhibited. *Id.* However, after an adolescent has made a risky decision, they are later able to reassess their decision with the long-term consequences in mind, after the heat of the moment has passed. *Id.* Unfortunately, minor parents don't always have the opportunity to reassess their decisions, so the inability to appreciate the magnitude and long-term impacts of parenting decisions can lead to unjust and unforgiving consequences. For example, a minor who loses parental rights at a young age may have that used against her when she becomes a parent in the future. Godsoe, *The Legal Status of Pregnant and Parenting Youth in Foster Care*, 17 U. Fla. J. L. & Pub. Pol'y. at 28. In Washington, reasonable efforts to unify the family are not required when a parent previously failed to complete treatment and had parental rights terminated. RCW § 13.34.132(4)(h). A minor parent's ability to make an informed decision should be fostered with proper support and legal counsel. Minors require extra assistance in making decisions that will follow them for the rest of their lives.

C. Minors receive extra protections in most every area of the law and deserve similar support to protect their right to parent.

In most any area of the law, minors are granted special protections. For example, they are afforded more leniency than adults when it comes to contract law, tort law, and even criminal law. Minors are limited in the decisions they may make for themselves, such as the ability to enter into contracts, obtain abortions, or consent to health care. Godsoe, *The Legal Status of Pregnant and Parenting Youth in Foster Care*, 17 U. Fla. J. L. & Pub. Pol'y. at 2-3.

Congress specifically considered the devastating effects the loss of a child can have on young mothers when passing ICWA. The Seattle Indian Center submitted written testimony that describes the stories of three young Indian women, all of whom were under the age of nineteen, who experienced incredible suffering due to the policy of separating them from their children. 1977 S. Hearing at 300.

The law should work to mitigate these impacts by affording better protections to minor parents than those currently available. The State of Washington has recognized this to some extent. In Washington adoption proceedings, a minor parent is legally guaranteed representation from a guardian ad litem. RCW § 26.33.070 (2011). The guardian ad litem is required to determine the best interests of the party as well as report to the

court whether the minor parent's consent to adoption or relinquishment of parental rights was voluntary. *Id.*

Unfortunately, the Washington Juvenile Code does not offer extra protections for minors in third-party custody proceedings. ICWA and WICWA, however, offer protections which are intended to cover exactly this type of voluntary guardianship. *See* 25 U.S.C. § 1913; RCW § 13.38.150. Minor parents of Indian children are entitled to the protections ICWA and WICWA provide.

CONCLUSION

Because Ms. Acevedo was a minor parent who voluntarily entered into a guardianship for her Indian child, both ICWA and WICWA protections should apply in determining whether to modify the child custody order concerning N.J. and invalidate the current guardianship.

Respectfully submitted,



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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 28th Day of December, 2018, at Seattle, WA.



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CENTER OF INDIGENOUS RESEARCH AND JUSTICE

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Comments:

This is a Motion for Leave to File Amicus, Amicus Brief/Cert Service, Notice of Appearance and Pro Hac Vice application. Thank you!

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