



INSTITUTE FOR JUSTICE

TRANSCRIPT

A \$100,000 Parking Ticket? What To Do About Outrageous Fines, Fees, and Forfeitures

March 24, 2021

Melanie Hildreth (MH): Good afternoon everyone, and welcome to IJ's LIVE call discussing how the government uses fines, fees, and forfeitures to raise revenue, how that violates the Constitution, and what IJ is doing about it. I'm Melanie Hildreth. I'm here today with IJ President and General Counsel, Scott Bullock, who will be hosting our conversation. We're joined by IJ Attorney, Diana Simpson, and IJ Senior Research Analyst, Jenny McDonald.

[00:28] We will take your questions live later in the call, so if you have a question for any of our speakers, you can press star on your phone any time to be added to the queue. With that, I'll turn it over to our host, Scott Bullock.

[00:39] **Scott Bullock (SB):** Thanks very much, Melanie. Well, we have a lot to cover this afternoon and we're going to be primarily focusing our discussion on how the government raises revenue from fines, fees, and forfeitures, the constitutional problems with these systems, and how we're tackling this in the courts of law, the court of public opinion, and even, encouragingly, in some legislatures now, too.

[01:02] As many listeners know, IJ launched our initiative against civil forfeiture back in 2010. Civil forfeiture, of course, is this insane power of the government to take your property without convicting, or oftentimes even charging you, with a crime. We discovered, as we've been fighting this battle and making a lot of progress over the past decade, that what was really driving this abuse was the perverse financial incentive at the heart of civil forfeiture laws. Then, that led us to discover how governments are also seeking to gain revenue through abusing its fining power as well. We call this taxation by citation, and it really finds now that many places are not about protecting public health and safety or even punishing wrongdoers, they're really about raising revenue for the government. This falls really disproportionately upon the people who are least able to afford it.

[02:03] This problem has been driven to the fore now because of the economic fallout we're seeing from the pandemic. Governments are really desperate for new revenue, and they are turning increasingly to their fining and forfeiture power. To just give just one example, Mayor Bill de Blasio of New York City, had in his latest budget a plan to make up for lost revenue that included a \$150 million annual increase in the number of fines and forfeitures. That was put into the budget and is a signal to those in enforcement to go out and try to extract as much money as possible from citizens through the fining power and through the

forfeiture power. As I mentioned, the core of these problems with fines, fees, and forfeitures is this very perverse financial incentive that really encourages governments to treat their citizens like ATMs.

[03:05] We had a big decision back in 2019, many people will remember, in the *Timbs* case, where we won a landmark decision from the Supreme Court that held that the Excessive Fines Clause of the Eighth Amendment to the U.S. Constitution meant something and it applied to state and local governments. The *Timbs* case arose in the context of civil forfeiture, but it also directly impacts our fines and fees work as well. We are now in the process of building upon that precedent with lawsuits throughout the country.

[03:40] I want to kick off the discussion with our two guests here today, by talking about one of our latest cases that brings us to Lantana, Florida. It involves, believe it or not, a \$100,000 parking ticket. Diana why don't you tell us a little bit about what's going on in that case?

[04:02] **Diana Simpson (DS):** Sure! Sandy Martinez is a working-class mom who lives in Lantana, which is a small town just outside of West Palm Beach. She bought her home back in 2004, and she shares it with her three kids, her mom, and her older sister. They're a working-class family, and they live paycheck to paycheck. Sandy, two of her kids, and her sister all work full-time, and they rely on cars to get to and from work, so parking in their relatively small driveway can be a bit like playing Tetris sometimes. They're mostly successful in parking neatly, but occasionally the cars will protrude into their yard by a few inches, which unfortunately for them, is illegal in Lantana.

[04:43] So, the city fined her \$250, but this wasn't just a one-time citation. Lantana presumes non-compliance until the homeowner calls the city, has a code enforcement officer out to inspect, and then confirms that the violation has been remedied. And, of course, as anyone who has ever tried to call the government before knows, code enforcement can be difficult to get ahold of. Sandy tried several times, but she could never reach an inspector, and she simply forgot to keep following up. Unfortunately, she was hit with a \$250 fine each and every day. Once she realized the fines were accruing, she immediately called and was able to get an inspection, but by then her parking citation had reached \$101,000.

[05:31] This is on top of two other code enforcement actions that she had encountered with the city of Lantana. She had cracks in her driveway, which they fined her \$75 a day for 215 straight days. She couldn't afford to fix them right away, and so she ended up with a fine greater than \$16,000, which is way more than the cost of a brand-new driveway. In addition to that, her fence had become heavily damaged in a storm, and Sandy was waiting for her insurance claim to process, so she could afford to replace it. The city didn't particularly care about that, and so they assessed a \$125 a day fine for 379 straight days. So, she ended up getting a \$47,000 fine for a downed fence, which is far greater than the cost of a brand-new fence.

[06:21] All told, the city has fined her \$165,000. The driveway issues are minor and cosmetic, and there's really no place else for Sandy to park. There's no street parking available, and the fence isn't even required in Lantana. It's not that she was required to have one, but once hers fell, they decided to hit her with these massive fines. These fines are

financially crippling. The city offered to settle for \$25,000, but only if she paid in full in three months. Remember, she's living in a paycheck to paycheck kind of existence, so she couldn't come up with \$25,000 in three months. Unfortunately, the mortgage and fines exceed the value of the home, so selling really isn't an option and she's stuck.

[07:12] **SB:** Yeah, this just seems like an incredible story. It is also one where the government is trying to say, "Oh, we'll settle for a smaller amount," and what they're really doing is just putting the financial squeeze on people to try to extract as much money from them as possible. Now, I wish this were just an isolated incident that we could point to, but as our strategic research has demonstrated, this is unfortunately not a problem that's really limited to a smaller community in Florida. Isn't that right, Jenny?

[07:50] **Jenny McDonald (JM):** Yeah, unfortunately, we see this kind of behavior happening all over the country. Usually, it's small towns where residents are fairly low-income, and the cities don't otherwise have a large tax base. The property values are not very high and that sort of thing, and so what they do is try to balance their budgets on the back of some of their lowest-income residents.

[08:16] To study this, we wrote a report called, *The Price of Taxation by Citation*. We conducted a case study in three Georgia cities that are similar to Lantana—they're small, they're lower-income, and they get a lot of revenue from fines and fees. What we found is that most of the citations in these cities are for things that are purely aesthetic, like long grass or some chipped paint. We're not talking about things that really pose a serious risk to health and safety, and that's exactly what we saw in Sandy's position as well.

[08:50] **SB:** What's incredible about this too, is that a lot of cities now are transforming away from a complaint-based system, which is understandable. It is where if their neighbor is really letting their property go to siege, you can call up the government, and they send somebody out to talk to the person. But what we're seeing in Lantana and in so many of these other places is proactive, aggressive enforcement of their codes as a way of trying to get those fines from the citizens. So, let's turn back to Diana and talk a little bit about some of the legal claims that we're making in Lantana and some of our other cases where we're challenging the fining power.

[09:35] **DS:** Right, Lantana is one of our fines and fees cases, and all of these cases really ask whether a particular violation is too much for the circumstances. We ask questions like: What law did the person break? How harmful was their activity? How is the government punishing them? And, what are the government motivations? For example, is it problematic revenue generation or is it something else? All of these really boiled down to proportionality. A \$200 ticket for grass that's too long in your front yard—that doesn't really turn someone's stomach, but \$30,000 in fines for grass that's too long in your front yard really does. It's not just about turning your stomach and feeling a little sick, it's also about what the Constitution protects against.

[10:23] As Scott had mentioned earlier, our win in *Timbs* was revolutionary. It reinvigorated the Excessive Fines Clause of the Eighth Amendment to the U.S. Constitution, and we are litigating under that and the state law analogues nationwide. A constant protection in Anglo-

American history, tracing to at least Magna Carta in 1215, is this consideration of excessiveness, and Magna Carta required that sanctions be proportioned to the wrong. That's where we focus on proportionality, that's where that comes from. We ask questions like: What was meant to be outlawed by a particular law? And, how does this particular crime relate?

[11:04] Lantana is not the first time we've raised this claim. We're raising an excessive fines claim in our Chicago impound lawsuit, where the city impounds cars for a variety of reasons and then refuses to give them back unless people pay thousands of dollars in fines and fees. It traps innocent owners as well, so these are people who did literally nothing wrong, and that is the definition of disproportionate and thus excessive.

[11:26] Fines and fees we see as one option for the government when they're trying to take someone's property. Sometimes the government goes down the forfeiture route, sometimes they're imposing extreme fines, but the ultimate goal is to transfer title of something valuable back to the government. That's really not how the government's supposed to operate, and that's not what they're supposed to be doing. Unfortunately, these cases aren't just raising excessive fines problems, they're also raising due process problems and a lot of other similar types of issues.

[11:59] Another one of our cases right now is in New York City. The city issues citations for construction code violations. For example, most work requires a permit, and the city is not shy at all about citing people for work done on their home without a permit, even if that work was done by a previous owner on, let's say a bathroom, for example, and the current owner bought the house with all of that work done. They end up facing these very substantial fines—a single citation can be \$25,000, and they quickly add up.

[12:30] In addition to the cost of these fines, they're posing due process problems as well because some of these citations can never be challenged in court, and the only thing a homeowner can do is pay. This kind of system deprives people of the basic requirements of due process. It also imposes these really excessive fines, and this is what the Constitution is designed to protect against and actually does protect against. So, that's what we're doing in court.

[13:00] **SB:** Well, as I mentioned there is a special urgency right now to addressing these problems. I'd like to turn back to Jenny to discuss some of the research that we've done that supports this concern, and I'm talking in particular about the study that we did called *Fighting Crime or Raising Revenue?* Then of course, also our landmark, go-to guide, that we did on civil forfeiture, the third edition which just released at the end of last year, *Policing for Profit*.

[13:30] **JM:** All of these systems are designed to provide funding for government agencies when that funding doesn't come from the normal appropriations process through which they're supposed to get their funding. When times are tough, as they are right now with so many people out of work and everything struggling thanks to the pandemic, we need to pay special attention right now because this is when this behavior is going to spike. The fines and

fees behavior in the three Georgia cities I talked about followed the same trends as the 2008 financial crisis, and unfortunately, we see that same thing in the forfeiture context.

[14:08] As Scott mentioned, this last edition of *Policing for Profit*, introduced a new analysis where we compared crime rates in New Mexico before and after that state completely abolished civil forfeiture and the profit incentive that is baked into civil forfeiture laws. What we found is that there was absolutely no change in crime rates as a result of that law changing. What that tells us is if forfeiture isn't really fighting crime, what else is it doing? The very easy answer is that it is funding law enforcement.

[14:45] After that, we have done another two studies with our friend Brian Kelly, who's a professor at Seattle University, and he looked at both state and federal forfeiture data. Again, he found absolutely no relationship between forfeiture and crime rates or drug use. But what we did find, was that when economic times are tough, as indicated by unemployment rates being fairly high, agencies tend to participate in more forfeiture. So, again and again, we see that state and local government agencies are using their enforcement authority to compensate for budget deficits and budget cuts. They're trying to find that extra funding outside the normal process, and again, often at the expense of some of their most vulnerable citizens.

[15:28] **SB:** Right, governments don't want to cut spending, so let's just look for the increasing sources of revenue.

[15:37] **JM:** Exactly.

[15:37] **SB:** What these studies have also shown too, Jenny, is that, in addition to it being so obvious that it's about raising revenue, it really leads to a lot of tension. The citizens are onto what the government is doing here, they understand what's happening, and it's led to even greater distrust between government authority and the citizenry.

[16:00] **JM:** Right, you know, people aren't stupid. When government is abusing its power in particularly obvious ways, there's going to be some sort of reaction to that. As, we all remember from the riots that happened in Ferguson, Missouri several years ago, the law enforcement agency in that city was abusing its power, and the people responded accordingly by having absolutely no trust in these agencies that were supposed to, at the bare minimum, protect public safety.

[16:31] The Department of Justice did an investigation after the effect of those Ferguson events, and they documented severe decreases in trust for public agencies after this happened. We also found that with the survey that we did with our three Georgia cities, that people who have received some of these code enforcement citations have lower trust in their local governments, in their local law enforcement, and that undermines really the general functioning of society.

[17:07] It's always good to be a little skeptical of government.

[17:10] **SB:** True!

[17:10] **JM:** But we also trust that our police are going to keep us safe, right? When this kind of thing happens, we don't even trust that the police are going to keep us safe, and it's a problem for entire communities.

[17:20] **DS:** Indeed, and that's something we're seeing in Chicago as well. Jenny, you were talking about the budgetary shortfalls from COVID and other kinds of financial stresses, and Chicago is facing a \$2 billion budget shortfall just for the 2020 and 2021 fiscal years. Some of that certainly is from the pandemic, but some of it's from broader issues, like their unfunded pension liabilities and rising pension payments.

[17:46] The city is doing what it can to collect debt, but they're having a tough time. They don't want to impose extra taxes because taxes are politically unpopular, and so one of the avenues they're going down is to try to collect unpaid debt that residents owe for things like tickets and court fees. This past spring, one of the ways in which they did that was by intercepting state tax refunds from people. They ended up bringing in \$20 million, and most of that was coming from people who were living in poorer neighborhoods of the city.

[18:20] This is a fairly standard activity. When you look at the speeding cameras and the red-light cameras in Chicago, they are disproportionately present in the poorer neighborhoods, and so people who are driving through these neighborhoods are getting a lot higher percentage of these tickets than they should. That's despite the fact that they're less likely to be driving themselves in their own car, as opposed to taking public transportation.

[18:47] So, you have yourself with a city that is infamous for its corruption, and they are forcing their poorest to pay a much higher percentage of their income, which is regressive taxation. And that's pushing to a debt spiral where unpaid tickets are quickly doubling in amount, people are accruing additional fines, their cars are getting booted and impounded, sometimes people are losing their cars in that whole process, and they're also losing their licenses. There's some change afoot in some of that, particularly with the suspended driver's licenses, but certainly not enough and not quickly enough.

[19:22] **SB:** Well, this is something where people really are becoming much more aware of what is happening here. One of the encouraging things that we've seen occurring in several states throughout the country are legislators actually getting interested in this. I oftentimes note that legislators and politicians are the lagging indicators of change in public opinion. They discover that people care about these issues, and they want to get on board with it.

[19:47] But it has been encouraging to see that now state legislatures in several places have changed their forfeiture laws. You had mentioned the gold standard in New Mexico, which has essentially abolished civil forfeiture. We're seeing that in other states and then also some interest in trying to curb this fining power, as well. So, why don't you talk a little bit about that, Jenny?

[20:10] **JM:** I think it's important to remember that civil forfeiture alone is a billion-dollar industry. We chronicle this in *Policing for Profit*. In the last 20 years, state and local agencies have brought in more than \$68 billion. This is a hugely profitable system for law enforcement agencies, code enforcement agencies. When you couple that with the fact that police unions

are extremely politically powerful, they are highly motivated to protect their revenue streams, and that means that the legislative fight is really an uphill battle.

[20:47] When I testify in front of state legislatures, I can go in and talk about all of the horrible things that happen due to civil forfeiture, all of the due process rights, all of these extreme things, but often the police lobbyists just have to stand up in their formal uniforms and offer this parade of horrors about all of the crime that's going to happen if forfeiture is just even slightly reformed.

[21:12] However, we now have all of these studies that I mentioned previously that show that forfeiture doesn't actually fight crime. So thankfully, a lot of state legislatures are starting to take heed, really listen to the evidence, and realize that they need to do the right thing and reform these civil forfeiture laws.

[21:28] We've seen at least half a dozen states right now that are working on replacing civil forfeiture with criminal forfeiture. A few states are even working on removing the profit incentive, so taking all of the proceeds from forfeiture and sending them to a general fund or a school fund, so that the people who are seizing property are not the ones who benefit from the proceeds. And that's all very encouraging.

[21:52] Even on the fines and fees front, which is a newer area for legislative reform, we're starting to see that states are looking at eliminating local agencies' ability to suspend driver's licenses for unpaid court debt and tickets. We're definitely facing an uphill battle, but we're making some really encouraging progress, and I think things are only going to continue to get better when you've got people like IJ really on the front lines and doing this hard work to make positive change.

[22:19] SB: Yeah, you're definitely right! It is hard work doing this given the political power of especially law enforcement agencies, and any time when revenue is at stake that is when they fight the hardest to maintain their revenue stream. To just see the lines of police chiefs or officers that are standing or sitting before legislators, they're sending a message there that you don't want to cross us, and so these fights are very difficult, but it is encouraging to see the progress that we're making, or we're going to continue to make.

[22:57] JM: Absolutely.

[22:58] MH: I'll jump in here to say that we're going to start taking live questions in a couple of minutes, so for those on the line who want to ask a question, just press star on your phone to be added to the queue. But before we turn to listener questions, Scott, I wondered if you could kind of wrap things up by talking about how IJ is going to escalate our efforts in the face of the urgency that you, Diana, and Jenny have been describing throughout the call.

[23:23] SB: Yeah. It's encouraging right now because you're really seeing some real re-thinks going on on some of the signature IJ issues: on educational choice with people's disgust with the public school system in the past year, on occupational licensing where states are waiving many licensing requirements, especially in the healthcare field, and then also what's been happening starting this past summer on the immunity front where IJ had

launched, just last year, our Project on Immunity and Accountability. That issue has risen to the public fore in a way that few people had anticipated and that we are really going to capitalize on.

[24:00] What you're also seeing in the wake of the pandemic is the backlash on these other issues that IJ has been litigating - forfeiture, defining power, and where governments are going to try to make up for this lost revenue. The issue has never been more important. This area of our work is some of our most varied and active practice. It's also very cutting-edge, too. We are really making the law as we go along. There haven't really been a lot of decisions on this, and we are really establishing the precedent that we are going to build upon and that others are going to build upon to rein in these abusive powers.

[24:42] It's a really important time, and it's a really exciting time. It also underscores, I think, especially with some of the things that Jenny was just talking about with some of the political power of law enforcement and government agencies on this, is really, the importance of the courts. The courts have to play a vital role in protecting these rights. That's where you can have the most level playing field. So, in addition to pushing all of our research and trying to get this changed in the legislature, we are still going to remain very focused on trying to establish this precedent that not only helps our clients but helps thousands of other people throughout the country.

[25:24] MH: Thank you, Scott. All right, we can start turning to questions from listeners. Remember, you can ask one just by pressing star on your phone. We have a few people asking questions, but before we turn to the live questions, I wanted to start with one quick one that was submitted in advance.

[25:40] We had two on related issues, one from Philip in California, who said, "Does IJ reach out to universities to collaborate on research on this issue? For instance, if I had a student who wanted to do a master's thesis on civil forfeiture, can they access IJ data or collaborate with IJ staff?" There was a similar question from Harlan in Pennsylvania who wanted to know about how granular we get in our data and how someone interested in a specific jurisdiction could access information about a particular place.

[26:12] JM: We love when people use our data! We spend a lot of time collecting it, and so when people other than us can also use it and do additional research that makes us really happy. All of our data that we use in our studies is available online. We publish it with all of our reports. For this latest edition of Policing for Profit alone, we collected more than 17 million data points about seized and forfeited property, so there's a lot out there.

[26:40] We also do a ton of Freedom of Information Act requests to get data that sometimes public agencies don't really want to give up. And when they really don't want to give it up, we sue them. We have some great partners in the private sector who represent us pro bono to help us to sue these recalcitrant agencies so that we can get our records that way.

[27:02] There's a lot of information. We frequently work with graduate students and with reporters. We recently held a webinar where we explained all of the forfeiture data that we

have at our disposal and tried to give ideas to investigative reporters about how they can use the data to really dig into their local agencies and see what's going on. We have a lot of stuff.

[27:26] The granularity of the data depends on the geography that you're looking in. Some states, when it comes to forfeiture data, have information that's at the level of every single piece of property that's seized. When we have that kind of information, we love it because it just tells us everything we could possibly want to know about the program. Some states are better than others, but everything that we have is online. If anybody ever has any questions about our data, they can get in touch with me or anybody else on the strategic research team. We're happy to be as helpful as we can be on that.

[27:59] MH: Terrific! All right, we'll take our first live question. It is from Paul in Michigan. Paul, you are live. What is your question?

[28:09] Paul from MI: Thanks very much. It's Paul Drake here. My congratulations to the IJ team on their great work. The thing that I wonder about since you're headquartered in Chicago, one of the more corrupt cities in the world, and attacking their sources of income, are you seeing any direct blowback?

[28:30] DS: This is Diana, one of the attorneys, and I'll say that we're not headquartered in Chicago. We're based in Arlington, Virginia, but we are currently suing the city of Chicago for its inbound program, and we've sued them in the past for some of their other constitution violating activities and laws. It's always fun to kind of beat up a little bit on Chicago. I think that they don't particularly care about the Constitution in a way that is very frustrating, and something that we do tend to sue over. And when governments respond, I don't know that we have a ton of blowback from them necessarily. We'll just keep coming at them because they're doing things that violate the Constitution, and they know that we're going to keep coming for them.

[29:18] SB: Great hearing from you, Paul! You know, one of the things we have in Chicago is our University of Chicago Clinic, too. So, we've been working with law students there and helping a lot of entrepreneurs there make their way through the morass of Chicago regulations. That's been really encouraging to see, and they've also become more involved in activism to try to change the dreadful state of many laws there. We're going to stay active in that city, but in all of our cases, we're willing to take on the powers that be, and to do it in the courts too really guarantees that you're going to get a fair hearing rather than the meat grinder of politics.

[30:07] MH: All right. We have a question from Mike. Mike, you are live. I think you're not from DC, but that's where your phone number is from. Do you want to ask your question?

[30:19] Mike from VA: Sure, Mike Hartmann, from Virginia. My question is are the actions that you're doing, I just want to confirm it, in all cases against municipalities, counties, and so forth and not against homeowner's associations, condo boards, or similar private-sector type entities?

[30:41] **DS:** Yeah, that's correct. We sue the government and just the government. So, whether that's the federal government, state, or local governments, there are a variety of different entities, but we're exclusively suing the government.

[30:54] **SB:** Yeah, we don't discriminate in the level of government that we sue. I oftentimes tell people that we have currently have lawsuits against the federal government, many state governments, and many local governments, but they're all against governments or governmental bodies. That's right.

[31:10] **MH:** All right. The next question is from Ed in New York, the site of one of Diana's lawsuits. Ed, do you want to ask your question?

[31:18] **Ed from NY:** Sure. As far as the lawsuit in New York, many years ago, 30 years ago, when Mayor Dinkins was asked how he was going to balance next year's budget, he point-blank said, "by issuing a million more citations." So, this is an old thing. One quick comment regarding whether the fines should go to a third party: In New York, some of us actually tried that with punitive damages. Why should a party be getting punitive damages in addition to compensatory damages? Maybe punitive damages should go to the schools or the hospitals or whatever, and you could imagine how far we got with those.

[31:55] My two questions are these and they go in the opposite direction. The first is: Are you finding that courts are, in fact, resistant to hearing your claim saying, "This is a political issue, we're not a super-legislature?" All of the arguments you normally hear, "If you have a problem, go to the legislature about what is reasonable and excessive; don't come to us."

[32:18] The second thing, on the other end is: Is it possible to sue the government for something more than to make them stop for some type of punitive action? I remember reading that one police department used forfeiture money for cappuccino machines, and things really outrageous like that. Is it really possible to go after a police department for basically shaking down its populous? Thanks.

[32:47] **SB:** Thanks, Ed. Well, those are two great questions, and thankfully courts have been much more open to our arguments really across the board. That was something that you heard really in the early days of IJ which is that "You've got to turn to the political system," you know, "These rights aren't really that significant under the Constitution," and that's really changed over the course of now almost three decades of litigation. We now have precedent on our side that we can build upon. Courts are increasingly taking these rights seriously, so we're not hearing that usual refrain. We also, as you know, emphasize the role of judicial engagement, too. Judges have to be engaged and have to enforce the limits that are in the Constitution and protect the rights that are enshrined there.

[33:37] So, we have been seeing some really encouraging progress on that front. And then, as you might've been reading about, and I mentioned a little earlier, our Project on Immunity and Accountability, it is very difficult to get damages from the government. Because of these doctrines, like qualified immunity, prosecutors usually enjoy what's called, absolute immunity.

[34:02] So, it's extremely difficult to get monetary damages from the government. We're working to change that because we think that has really no basis in the law or in the Constitution, and you'll hear more about that. What we typically focus our efforts on are getting injunctions to stop government from its nefarious practices, to declare laws unconstitutional, and to get our clients back in business or to get their property back. You should be able to get more damages from the government when they violate your rights, but it's going to take more work to get to that point.

[34:42] **MH:** Okay, I think we have time for one more question. So, we'll take one from Michael in Illinois. Michael, you are live; what is your question?

[34:51] **Michael from IL:** This is a softball question. How is it that IJ manages to consistently get very sympathetic plaintiffs? The case in Lantana is completely outrageous. There's not a sane, sentient being on the planet to say that these people have done anything wrong, and \$165,000 is completely outrageous. That takes talent though, to consistently do that, because in many of the cases I've been following that IJ has been pursuing, the plaintiffs are always just really sympathetic. It's incredible.

[35:23] **SB:** Well, thank you for that. It's something that, you know, we always put the human face on the issue. Now, what we see over and over again, unfortunately, are that these people and, situations are not unique. I wish it were just the one in a thousand people that it happens to, but it is all too common in so many places. We do carefully work with the clients to see who are going to be the best ones to make the case about the injustice of these laws.

[35:56] We've been very fortunate to work with just everyday folks that are willing to take a stand on this. That's something that is really incredible to see and really inspiring to see - these kinds of ordinary Americans that are willing to put their lives out there, their pictures on our website and in newspaper articles because they feel like it's wrong. What's really great to see is how people then become real advocates for these positions. They realize that it's not just about their rights, but even after their case is over, they want to stay involved and say, "What can I do to make sure this doesn't happen to others?"

[36:35] **MH:** All right with that great question, love the softball, we are out of time for today. Thank you again to Scott, Diana, and Jenny for your insights. Thanks to everyone on the phone for joining the discussion. If you missed any part of the conversation, we will have links to an audio recording and a transcript available next week. If you have questions or comments that we weren't able to get to this afternoon, please just stay on the line to leave a message. You're also welcome to email me directly, and we will be sure to get back to you. Thank you again and have a great evening.