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SPEAKERS

Joanna Schwartz, Kasia Wolfkot, Anya Bidwell



Anya Bidwell 00:11

Hi everyone. Welcome to a very special Short Circuit recording. We have two amazing guests, UCLA's Joanna Schwartz and Brennan Center's Kasia Wolfkot. I'm Anya Bidwell, your substitute teacher. Anthony will be back for a special Christmas edition. But today we're not in the mood for a holiday. Instead, we have our serious business hats on. Joanna and Kasia are here to help us think through what states and municipalities can do to enhance government accountability in their jurisdictions. After all, we are a union of states. Each state has its own executive, legislative and judicial branch, and each state is responsible for its own relationship with the people who live within that state. Municipalities also have a say in how they want things run, and have a certain amount of leeway in controlling what happens within their own jurisdictions. So thank you both for being here, and I'd like the two of you to first set the scene. Kasia, can you tell us why the federal constitution is often insufficient to address constitutional wrongs? The impression is often that we have this beautiful constitution and it guarantees us certain rights. Why is that guarantee not enough?



Kasia Wolfkot 01:40

Yeah, thank you so much for that question, and I'm so excited to be here. So I started kind of, I don't want to say losing my faith in the federal constitution, but starting to wonder if there were other paths towards right protection. When I was working for the MacArthur Justice Center as an appellate attorney challenging cruel and inhumane prison conditions under the federal Eighth Amendment, and just over and over again, we found that the federal courts were just a very inhospitable place to be litigating those claims. There were very high standards that incarcerated plaintiffs had to meet that sometimes felt impossible. There were judge-made doctrines like qualified immunity, that even if you had a meritorious constitutional claim, like even if your constitutional rights were violated, and a court agreed that they were violated, they might say, well, you know, we've never had a case exactly like this before, so the defendants in this case couldn't have possibly known that they were violating your constitutional rights. So sorry, no relief. And it just felt like there were so many hurdles to actually vindicating those constitutional claims, those constitutional rights. So while I was there,

I started thinking about using state constitutions to protect people's rights, and since we've seen a rollback of federal constitutional rights, most notably with the Dobbs decision, but there have been others at the US Supreme Court, I think that looking to other paths for rights protection is more important than ever.

A

Anya Bidwell 03:17

Yeah and that kind of gets to this state judiciary thing, essentially vindicating your rights through the judicial branch. Joanna, you've been looking into police misconduct for over 20 years, and you've been looking specifically to what the executive branch and the legislative branch can do. So before we go into that, can you talk about what the extent of the federal government's involvement is when it comes to regulating police, what are productive and counterproductive things that the federal government can do in helping or hurting the relationship between the police and the public?

J

Joanna Schwartz 04:01

So the way that our system currently works, law enforcement is highly localized. There's something like 18,000 law enforcement agencies across the country, and they are minimally constrained by federal government oversight. That's not to say that they couldn't be more constrained, but in our current system, there are limited powers that the legislators have used to try to regulate policing, and often to the extent that there is federal legislative control, it usually comes through the power of the purse, conditioning federal funds on adoption of certain policies, or providing grants to encourage agencies to adopt certain policies. There's also the power of the president who can, through executive order, create some limits or requirements on law enforcement or again, incentivize conduct that the president wants followed. If you think about the George Floyd Justice in Policing Act, which was proposed and negotiated and ultimately failed following the murder of George Floyd in 2020. Several of those provisions that failed were then enacted by executive order by President Biden. And so that is another source of power. Finally, there is the Department of Justice. And the United States Department of Justice has a civil rights division that has since the 90s, had the power to investigate systemic constitutional failures in police departments across the country. One of the reasons that power is so important is because of a limitation along the lines of what Kasia was talking about before, imposed by the Supreme Court, making it very difficult to get injunctive relief or policy changes as a private plaintiff in a lawsuit. So the United States Department of Justice can do these extensive investigations and can litigate claims, can be parties to consent decrees with court monitors, and those consent decrees and investigations have, I think, played an important role in the shape of policing and police reform over the years. Although, the power of the Civil Rights Division is dependent on the president and even in presidencies like Barack Obama's among the most aggressive in those fronts, there's still only about two dozen attorneys who are bringing those cases. And so in a country that has 18,000 law enforcement agencies, this is a limited power, but an important one.

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Anya Bidwell 06:54

So just to kind of bring it to current events, right, the DOJ just recently asked for a consent decree from Memphis, right? Can you kind of give us an example of how that's going, and the power of the federal government, and I guess the limit of it too?

J Joanna Schwartz 07:16

Sure, well, importantly, any power that is that is given to the President and their administration is going to be exercised in different ways depending on that administration. And in the first Trump presidency, President Trump made very clear that he had no interest in pursuing consent decrees, pursuing investigations of law enforcement agencies, and at the time in 2016 there was an investigation of the Chicago Police Department and negotiations toward a consent decree with the United States Department of Justice that then-President Trump and his attorney general said they were not going to pursue anymore, ultimately, and this goes to our conversation. It was the Illinois Attorney General who stepped in and ended up litigating that case, or resolving that case, and played essentially the role of the federal government. Biden's administration has opened, I believe, 12 investigations of law enforcement agencies in their four years. None of them have resulted in consent decrees as of yet, but now since the election, there seems to be a lot of energy from the Civil Rights Division to try to wrap those investigations up, one of which was of Memphis, and there was just recently a big report setting out those findings. Memphis is uninterested in negotiating a consent decree at this point, and frankly, I don't blame them, from a political perspective, because they have every reason to believe that Trump and his second administration is going to essentially absolve Memphis of any obligation to conform to or to address any of the problems that have been revealed in this exhaustive and extensive investigation.

A Anya Bidwell 09:15

Yeah. So really, the limitations of the federal government seem to be pretty clear in courts. You have all these procedural doctrines that are very difficult to overcome, and even substantively, you have rights that are really more of a floor, not a ceiling. And with the executive and legislative branches, again, you very much know that they depend on what administration is in power. You know they also have very, very limited abilities of even being able to do something. So let's talk about, maybe looking more to states and municipalities and figuring out going forward what public interest lawyers, for example, can do in those states and municipalities. So Kasia, let's say a police officer hurts you, or you've been mistreated in jail. What can a state constitution do to help you? And I know that it depends on where that actually happens, but kind of give us an idea of, I'm a lawyer bringing a case under a state constitution. What is that going to look like?

K Kasia Wolfkot 10:27

Sure, so this is going to vary state to state, which I think gets to one of the flaws of the strategy. You know, this is still a strategy that I am completely here for. This is a strategy that I am pushing. But like, I want to be open about this. So let's say my constitutional rights have been violated by a state actor, and I want to sue. Like I said, it depends on which state I am in. In some states, this might not be that hard, because maybe their state legislature has authorized these kinds of claims. Like they've said that their people, like me, have a cause of action, like this would be like a 1983 equivalent. Or as you at the Institute for Justice have

called them, baby 1983. Or maybe the state Supreme Court in the state that I live in has said that I have a claim that arises directly under my state constitution, even if the legislature hasn't said I'm allowed to sue for damages.

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Anya Bidwell 11:36

Yeah, so what you're talking about is even before you can start getting engaged on the substance of the rights you actually have to be able to even enter the court. And on the federal level, you can enter the court through section 1983 if you sue a state or local official. On a state level, you might be able to enter through an alternative to 1983, you might be able to enter directly under the Constitution, but some states will be harder than others when it comes to that, right?

K

Kasia Wolfkot 12:09

Yeah, I mean, forgive me for jumping right into the nuts and bolts of this, but I think it's important because I think it's very surprising when I talk even to other lawyers, and I say, Well, yeah, like you have these constitutional rights, but that doesn't necessarily mean that if your constitutional rights have been violated, you can sue anybody over it. And this isn't just, by the way, this isn't just about interactions with law enforcement or suits against correctional officers. Like there was recently a case in Delaware where somebody—Delaware, you know, supposedly has more extensive religious liberties in their state Constitution than under the federal First Amendment—and a woman sued over COVID restrictions on places of worship, trying to bring a state constitutional claim, and the intermediate appellate court there said, Sorry, you don't have a private right of action under the Constitution. Our legislature has never said that you could do that. So I mean, this is about all constitutional rights. But now let's say you've overcome that, like you are in one of these states where you know that you're allowed to sue, you have a cause of action one way or another. Going back to something that you said, Anya, the federal constitution should be a floor. States are free to provide more rights than the federal constitution provides, and many in fact, already have: like the state of Washington has rejected for conditions of confinement claims, they rejected the very difficult-to-meet standard that the federal courts have announced for incarcerated plaintiffs, where incarcerated plaintiffs have to prove subjective, deliberate indifference, which is to say they have to show what their abuser was actually thinking. And Washington said, actually, in our state, if you're trying to allege a violation of your Eighth Amendment cognate rights, you just have to show that the conditions created an objectively serious risk of harm. So, in theory, that's an easier standard to me than saying subjectively, this person knew of, or should have known of a risk to me and they disregarded it.

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Anya Bidwell 14:42

Joanna, can you talk a little bit about sort of post-George Floyd and what states did, or some of the states, at least did, to try to make it easier to achieve accountability in state courts for something like what happened to George Floyd, for example, but also other constitutional rights violations as well?

J**Joanna Schwartz 15:05**

Following the murder of George Floyd, I think there was a lot of energy and interest in state legislatures to do something to make some sort of shift, and Colorado was the first state that they actually had a bill that had been introduced in the spring that had gone nowhere, was gathering dust and then in May and June of 2020, was reintroduced that, to cautious point, created an alternative to Section 1983 that allowed for lawsuits to be brought for violations of the state constitution. It prohibited qualified immunity as a defense, and a variety of other things too, provided that there would be attorneys fees for prevailing plaintiffs in those cases, provided that officers who acted in bad faith could be required to contribute up to 5% or \$25,000 of a settlement or judgment, and created criminal penalties as well for failing to intervene. So there's sort of a variety of provisions in that Colorado statute, and it's sort of worth noting at this point that I think it's a really interesting statute, in part because it recognizes that only one part of the problem is having a right to sue, having the cause of action to be brought—there are all of these other things that can get in the way, not just qualified immunity, but whether there's attorneys fees, provisions, whether officers feel any consequences of these cases. And so Colorado is one example, New Mexico is another state that enacted a statute in 2021 that had some similarities and some differences, but again, sort of recognizing that the issues in these state claims are not just whether there's a cause of action, but also who is going to pay any settlement or judgment? Is there going to be a financial remuneration for lawyers who are bringing these cases? In the New Mexico example, they also are requiring that data be collected about these settlements and judgments, which is another piece of the puzzle, and there have been legislative efforts in many other states as well. I believe more than half of the states across the country introduced some version of this kind of statute. Notably, many of them have failed. They have been some perpetually reintroduced, but thus far, really legislatively, it's Colorado and New Mexico that have made the most significant changes. In this regard, there have been other legislative efforts as well, I should say, prohibiting chokeholds, for example, and no knock warrants and and other kinds of restrictions on police power that sort of fall into the general bucket of accountability, but, I mean, there is a lot of energy and interest, or at least there has been on the state legislative level to address one or more of these various accountability issues.

K**Kasia Wolfkot 18:45**

Joanna, can I jump in? Sorry, I read your article, Lessons from New Mexico—I thought it was fabulous. I learned a lot. So I recommend that to everybody who's listening.

A**Anya Bidwell 18:58**

We're going to post it on our website notes to the episode. Anthony, I hope you're hearing this.

K**Kasia Wolfkot 19:05**

And I just wanted to go off of that that I think the attorneys fees point is a really, really fabulous one. Like, I I'm always asking people like, I'm a little bit obsessed with this topic. I'm always asking people, Why do you think that there aren't more state constitutional claims raised in a state court? And the attorneys fees thing comes up over and over and over again, because, you know, there is a federal statute that provides for attorneys fees, for federal civil rights

violations. So I just think that that really contributes to the momentum behind bringing only federal claims and just taking these, taking your constitutional violations directly to federal court.

J

Joanna Schwartz 19:41

And can I say one additional thing related to that, which is that that New Mexico piece was a result of a symposium that the New Mexico Law Review hosted about the New Mexico statute, and it was a fabulous symposium, but part of what it revealed to me is that when you have a new statute like this, a new civil rights statute, the state courts then have the ability to rethink some of these things, not just the constitutional standards—although definitely that, what the state's constitution provides, which can be understood differently than the federal constitution, as Kasia had mentioned—but also things like entitlement to attorneys fees. So there's an article that's included in that symposium that says we can rethink what the standard is for awarding attorneys fees under this New Mexico statute. Under Supreme Court precedent, defendants have the power to to offer a settlement agreement that waives the right to attorneys fees, which is often used, which ends up meaning that plaintiffs attorneys don't get fees unless the case goes to trial and they win, they don't tend to get the fees if there's a settlement. And instead, the money is taken essentially as a contingency from the pot, awarded to the plaintiff. But this contribution to the symposium said there's nothing set in stone about how New Mexico interprets this attorneys fee statute. They could provide attorneys fees for successful settlements, or successful settlements in some categories of cases, there's a whole set of doctrines and practices that state courts can set that are not beholden to the way in which the Supreme Court has made those decisions.

K

Kasia Wolfkot 21:38

Such an important point and since these laws have been passed, like the Colorado one that you mentioned, and the New Mexico one that we're talking about right now, we have, in fact, seen an increase in state constitutional litigation, like in New Mexico, as far as I know, there had not been any state constitutional claims directly challenging prison conditions or solitary confinement, but after this law was passed, the ACLU of New Mexico did, in fact, file a class action challenging the use of solitary confinement in New Mexico under the state constitution, using this law.

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Anya Bidwell 22:14

Yeah, that's so interesting, and to that point, Nevada, just two years ago the Nevada Supreme Court announced that there is a right to sue directly under the Fourth Amendment in the Nevada constitution, or like the equivalent of the Fourth Amendment, the unreasonable searches and seizures clause. So there's almost like, it does feel like the court is kind of deciding it in this moment where not just state legislators, but also state judiciaries are rethinking what it is that they can do on the state level to provide an alternative to federal solutions. The other thing I've been thinking about is to the point of what state courts can do is how they interpret their own qualified immunity, or immunity type barriers, right? Kasia, maybe you can speak to that, because it's not often people assume that the qualified immunity standard at a state level is going to be exactly the same as at the federal level, but sometimes

it's like, does qualified immunity even come into this particular discussion of a violation of a right, or does immunity not apply? Very often, it's not the legislature that says it, it's actually a state court that says that.

K

Kasia Wolfkot 23:38

Yeah, so that Nevada case that you mentioned, *Mack v. Williams*, the Supreme Court there actually said that qualified immunity was not a defense for those claims. So that is an example of a state Supreme Court taking it on themselves to be like No, not here. Qualified immunity can be abolished legislatively by states, like you're saying it's not a foregone conclusion at all. And in fact, qualified immunity can also be abolished by a state constitution. I believe in Montana, the state constitution has been interpreted to not allow for qualified immunity. The Montana Supreme Court interpreted it that way, there was a failed attempt in Ohio to enact a constitutional amendment there just this last election. It didn't make it onto the ballot. I think it didn't get enough signatures, or something along those lines. But the point is that organizers can try to do that, like you can try to get a state to pass a state constitutional amendment in the states that allow for ballot initiatives. There are currently 17 states that allow for citizen initiated ballot initiatives. You can try to get a state constitutional amendment that says no qualified immunity in our state. So there are lots of different ways for states to do this, and they definitely don't have to follow federal law on this point.

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Anya Bidwell 25:02

And I guess the other side of it is that they can also pass laws that make it even more difficult.

K

Kasia Wolfkot 25:09

Yes, yes, of course. Right.

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Anya Bidwell 25:12

That kind of goes back to this idea of you have 50 laboratories of democracy.

J

Joanna Schwartz 25:18

Yeah. And I agree with Kasia that that is the other side of this coin to keep in mind—that there are initiatives that can be passed in states that have the the stomach to do it, or the legislators or the community pressure to make it happen. And then there are all sorts of places that can use state legislative power in other ways, to prohibit local governments from reducing the size of their police departments, or to pass restrictions on the ability to sue, so it ends up having to be a state by state proposition. My hope, and it may be overly optimistic, is that when states like Colorado and New Mexico enact these statutes, that they can be studied, their effects can be studied and used for advocacy in other places. So in New Mexico, for example, as soon as this legislation was enacted, there were calls to undo it, because of concerns that lawsuits would overwhelm the courts and officers would be bankrupted and local governments would be

bankrupted. And the state legislative committee did an investigation and found that none of those claims were true, and so rejected efforts to undo that bill. But hopefully, as we see five years out, 10 years out, how things are going in Colorado and New Mexico there that evidence can be used to further push for similar measures in other states.

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Anya Bidwell 27:08

Yeah, that's such a great point, because what often happens is the parade of horrible arguments, right, that, Oh, if we do this, then this is going to happen. If we do that, that's going to happen even when it comes to attorneys fees, where the arguments are just, Oh, these are just lawyers trying to get themselves private jets, and we don't want that to happen. So it's really interesting to see how these provisions actually end up working out, like, five years from now and then maybe it'll be easier to also pass additional legislative reform in other states. Joanna, in another one of your articles that you recently published in Inquest, you laid out specifically what states and municipalities can do, even outside of the judiciary, in terms of implementing policies that will make things better for the relationship, essentially, really, between the police and the public.

J

Joanna Schwartz 28:10

Yeah, well,, so the upside, I suppose, of policing being highly localized, is that state and local governments can play significant roles in advancing accountability. Part of what I imagine in the next four years will be state and local governments positions as it relates to initiatives by the federal government and whether local governments will participate in federal efforts to, for example, use local law enforcement for immigration enforcement. But there's other kinds of decisions that are really going to be up to states and localities. They can still pass their own statutes about the use of force, about the obligations to intervene, about police misconduct, reporting, decertification. As I mentioned, the state of Illinois, the Illinois Attorney General stepped in to pursue the investigation of the Chicago Police Department in Trump's first administration. There is the power of state attorney generals to do these investigations themselves. California and Colorado and Illinois have all had their attorney generals do these kinds of investigations and they can continue to do these kinds of things, and then there's plenty that can happen at the very local level: oversight about police budgets, about how much money is spent in police misconduct, litigation, about whether there are alternative responder programs that have people who are trained in crisis intervention, participate when there is an appropriate call for for help or service. So there's all sorts of ways in which local governments can play an important role and do, day to day, really determine the shape of policing in their communities. But again, this requires that there be state legislators, local city council members, community advocates, who are pushing for those kinds of progressive policies.

K

Kasia Wolfkot 30:34

You know, I also just want to add to that there: there are other ways that state courts can help ensure that people's rights can be vindicated besides just like deciding the cases in front of them—like, State Supreme Courts have what's called a rule making authority, and so they can change the rules around how their judiciaries function, including things like, in response to a stark lack of lawyers and attorneys for people who are trying to go before state courts, some

state courts have started experimenting with allowing people to be represented by paralegals, like allowing for some kind of legal help sanctioned by the court that doesn't require a law degree, just to kind of ensure that some of these people are getting the help that they need, and are more likely to win their cases. And I think you've written on this too, right, Joanna, just how much more likely you are to win a case if you have representation. So, you know, I'm not sure if you know it's like a one to one replacement, if you're having non-lawyers fill those roles, but I think it's probably better than people proceeding pro se. Like the paralegals that I've worked with throughout my career are fabulous. I remember at MacArthur truly being like, wait, you should just be the lawyer, like, I couldn't do my job without you. So they really frequently know what they're doing, and they're very familiar with the law. So that's just one example of the ways that state courts and state judiciaries can get creative in solving access to justice problems.

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Anya Bidwell 32:21

Yeah, Joanna, you've done studies of one police department versus another police department, right? And like, one jurisdiction versus another jurisdiction, just talking about municipal level, not even, like, state by state. What are the things that really jump out at you like, these are things that are by far the most helpful?

J

Joanna Schwartz 32:40

Well, so yeah, that's a piece I call "civil rights ecosystems." And sort of the idea that the ability to vindicate your rights really does differ based on where you happen to be filing those claims. And it's really a conglomeration of a lot of the things we've already talked about, different federal circuits have different interpretations of constitutional protections and qualified immunity. There are differences in state law, which we have been speaking about, in the right to sue. Then there are local differences that may simply be product of the political constituency or the political leanings of the constituency who might ultimately serve on a jury. There are differences in attorneys pools, how many plaintiffs attorneys there are available to take any given case. And you know, some of those differences are statewide, but some of them are very localized. I did some research about Vallejo, California, which is in the Eastern District of California, but only 30 miles or so from San Francisco, and yet, they have a different district, which means a different jury pool and a different set of people who might ultimately sit on those juries. And as a result, lawyers from San Francisco are less likely to make the trip to represent people in Vallejo, because they might prefer to stay in the Northern District of California rather than the Eastern District of California.

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Anya Bidwell 34:29

Yeah, that's fascinating. All those differences that sometimes you might not even take into account, but they really, really matter. Kasia, just to kind of wrap up this discussion. Can you talk about just what regular folks, activists, people just interested in these issues, folks listening to this podcast, what is it that we can do, even if we are not lawyers, even if we are not legislators, what can we do to ensure that the states we live in represent us and what we believe in?

K

Kasia Wolfkot 35:10

Well, I focus mostly on state courts. So you know, there's been some talk about legislation here. My call to action isn't going to be around legislation. I would say, pay attention to what your state supreme courts are doing. Even pay attention to what the lower courts are doing. I'm the managing editor of a Brennan Center publication called the State Court Report, and we just had a really fascinating article written by a prosecutor in Michigan about how lower courts are just as important—they're on the front lines of protecting people's rights and to the extent people ever pay attention to state courts, it's mostly state supreme courts, but they all matter. So pay attention to those races, because a lot of state judges are elected. Just this past election cycle, we had 80 something races for state supreme court justice across 33 states. Coming up in 2025, there currently are progressive majorities in both Pennsylvania and Wisconsin, but in 2025 there are state supreme court races in which those progressive majorities are on the line and could flip. So these are typically very low information races, you know, all judicial races, but including state supreme court races, yet, like 95% of all cases in the country are filed in state court. State supreme courts have the last say on so many important issues pertaining to your rights and the rights of your neighbors. So I think what I would ask people to do, I would implore people to just pay as much, if not more, attention to those races as you do to what the US Supreme Court is doing.

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Anya Bidwell 36:57

That's such an important point. Iowa, to me, is a great demonstration of what you're talking about, because in 2017 the Iowa Supreme Court issued this great decision where they said that you can file claims directly under the Iowa constitution. There is a right of action, and there were two dissenters in that case. Now fast forward five years, and pretty much everybody who was in the majority left that court, but the two guys who were in dissent now were the majority and the judge who wrote the dissent this time wrote the majority, and he said, that case in 2017 about the right of action in the Constitution, just kidding. And went back to the way it used to be.

K

Kasia Wolfkot 37:51

That's exactly right. So I think some people might hear that and feel like discouraged, like, well, these institutions, they could just swing so quickly. They can change so quickly. But I think that that is all the more reason to pay attention, that should be like a reason to not feel apathetic, because you as a citizen of that state, as a voter in that state, you could actually make a difference in changing the law of that state just because you are paying attention, and you get involved, and you talk to your friends, etc in a way where, like, we don't have that much of a say over who's sitting on the US Supreme Court, I mean, if any. Some people might say we have no say. You know, so, and once there's a change, it's a change for a very long time, whereas a short amount of sustained attention to state judiciaries can bring about a change. So I don't know. I think people should feel more empowered to follow those races, follow what those courts are doing and get involved in publicizing, paying attention, etc.

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Anya Bidwell 39:09

...leaves a lot more to say. What's your call to action? What should we do?

Joanna, last word belongs to you. What's your call to action? What should we do?

J Joanna Schwartz 39:16

Well, I think all of those things, all of the things that Kasia has mentioned make sense. And I think the same applies to the legislative decisions. You know, city council meetings are open. There's ability to push your city council members to take action. As Kasia had mentioned, there are ballot initiative possibilities that non lawyers and people simply interested in these issues can be involved in. The last thing that I would say, we haven't talked about it really at all yet. But when you get your jury notice in the mail, serve on a jury. Serve on a jury. Because that is the most direct way in which we, within our constitutional authority, can express our views about the legitimacy of government conduct in a variety of different ways.

A Anya Bidwell 40:19

That's a great note to end on. Serve on a jury! Onward! Well, thank you so much, Joanna, thank you Kasia, for being here and thank you for listening.

J Joanna Schwartz 40:29

Thank you!

K Kasia Wolfkot 40:31

Bye.

J Joanna Schwartz 40:31

Bye!

A Anya Bidwell 40:32

Bye.