
UC DAVIS LAW REVIEW

VOL. 54, NO. 4



APRIL 2021

When the Public Defender Falls Short

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Chances are I'm going to be talking about something today that many of you already know, either because you have firsthand knowledge of the role that public defenders play in the criminal process or because you've spent time critically thinking about how attorneys operate in a criminal justice process that is clearly inequitable on many grounds, and in particular, on race. But even though many of you may already know this intuitively, the goal of my research and contribution to the legal literature is to dive deeper into some of the current conversations that we have about reforming the criminal justice system. I explore if some of the things or the practices that attorneys engage in actually contribute to the very racial inequities in the criminal process they may fight against. I'm going to be talking about two strands of my research on this subject. My comments might make you think about other issues, so I'm

* Copyright © 2021 Irene Oritseweyinmi Joe. This is an edited version of Professor Irene Joe's presentation at the University of California, Davis, School of Law, as part of King Hall's Racial Justice Speaker Series. Many thanks to Dean Kevin Johnson and the UC Davis School of Law Leadership for creating this Racial Justice Speakers Series. Thank you also to the Law Review editors for their careful transcription of my words. The inspiration for this talk comes from the many system-impacted people and public defenders I have encountered in both my career as a law practitioner and legal academic. My hope is that it can help animate a reimagination of the public defender institution and serve as a source of encouragement for the many students pursuing racial justice work through the practice of criminal law.

looking forward to our discussion in the question-and-answer period to talk more about some of those.

My talk is titled “When the Public Defender Falls Short” and it probably makes sense to give all of you a sense of my work experience to provide a clearer context for you to use in situating my course of study. My entire background and research interests are about the criminal justice system and, more specifically, about how the system’s actors help or harm the effort to administer justice in a fair and impartial way. I started off my career doing death penalty work at the Equal Justice Initiative in Alabama before clerking for a federal judge who spent part of his early career as a public defender. I then moved to New Orleans to be part of establishing a new model public defender office in that state. After a few years there, I was asked to join the Louisiana Public Defender Board, where I was the assistant training director and created and held trainings for attorneys and other support staff throughout the state. In that role, I also traveled around the nation to help train public defenders in other states. I left that work because, in everything I was doing, I had these larger questions about why it is so difficult to be a good, strong, and healthy public defender. I questioned whether it is the structure of the institution or how individual offices are managed, or mismanaged in some cases, that makes the already difficult job of providing quality representation to defendants with limited resources even harder.

I eventually transitioned to a career in legal academia and, although I spend a lot of time teaching first-year criminal law and upper-level criminal procedure and legal ethics courses, I spend most of my days researching and writing about the public defender institution: how it operates and how the decisions by other system actors affect the ability of public defenders to do their jobs. I come from a place where I am constantly thinking about how public defenders can better do the job they are called to do, how the institution can take better care of the people that it hires to do the work, and how public defender representation and the public defender’s role in the criminal process could actually help our society operate differently and more admirably with regards to race and class in particular. I am going to talk about two ways the public defender situation can fall short of those goals today. The first is in how they handle misdemeanor cases, and the second is in how they take care of the attorneys and support staff who do the work.

I’ll start with discussing the mistake that public defender institutions make in representing clients charged with misdemeanor offenses. Most people would believe you should give the best lawyers, the most experienced lawyers, the more serious cases. They would believe that

when you separate criminal offenses into misdemeanors, which carry no more than one year of incarceration, and felonies, which can carry decades or life in prison, that the better lawyers should be assigned to the felonies. In fact, I believed that; I was excited to be an attorney in this brand-new public defender's office in New Orleans that shifted from assigning cases in a rather random manner to assigning cases based on a more formalized measure of experience where the less experienced attorneys handled the misdemeanors.

But after a few years of leadership and deeper analysis, I've come to realize that we need to think about these things differently. Now, I take a critical view of that type of decision. I argue that public defender leaders should consider doing the opposite; that is, emphasizing misdemeanor offenses by assigning more experienced attorneys to those defendants as a recognition of their role as government agents tasked with distributing a limited amount of resources to a large group of entitled persons. They should think about the effect their distribution decisions have in the aggregate and what changing their current approach could do for their client population, the public defender institution itself, and the community that the institution serves.

Let's be really blunt about things: one thing the U.S. criminal justice system is really effective at doing is finding ways to control the movement and behavior of Black and Brown people. We cannot deny that entire communities of African American and Latinx people exist in the shadows of an institution that literally picks them up out of their homes and out of their communities, out of their jobs, out of their schools, and transplants them to an entirely new environment that is under constant surveillance. And that happens regardless of whether an arrested or cited person is even sent to an actual jail or prison. The criminal justice system uses electronic surveillance, monitoring through probation departments, or even non-incarceration-type programs that require people to attend classes or submit to drug tests, and report on their job status and/or living situation in a way that controls their engagement with the world. Misdemeanor charges provide the system's actors with a more expansive power to do this. Law enforcement uses these "minor" charges to justify intensely monitoring and harassing certain marginalized communities, and prosecutors disproportionately and selectively charge members of those same communities.

As my friend and scholar Chaz Arnett would describe it, there is essentially a racial caste system in this country that helps solidify the

unequal distribution of wealth and benefits.¹ If you look at any area of American life you will find that those with darker skin are disproportionately worse off than those who are white. That is the case in education, in healthcare and health outcomes, in employment and housing, and yes, it is also the case in the criminal justice system. At every juncture of the criminal justice system, race can be a critical determinant of how you will be treated and this is particularly true in the case of misdemeanors. Take Ferguson, Missouri, for example, where protests raged for weeks over the abuse of Black people by law enforcement and the greater criminal justice system. One of the things noted was the extreme number of misdemeanor offenses levied against the Black citizens of Ferguson.² The city's criminal justice apparatus was essentially bankrolled by the fines and fees put upon the Black population.

The role that misdemeanor crimes play in the control of people of color did not just come to be by accident. These laws can be clearly linked to past racial caste systems. Public nuisance offenses, disorderly conduct, and trespass laws are some that resonate in a particular way.³ The idea that there are certain spaces that African Americans are not allowed to be in, certain ways in which they cannot act, and that upon any suspicion law enforcement can stop, question, and arrest them speaks directly to and fulfills the state's desire to dictate African American movement. And when it comes to private property, it implicates the larger realities about the rates of Black homeownership. I recall a mentee of mine in New Orleans was once arrested late one night for being on the front porch of a home that the officer did not believe was his. It turned out that it was his aunt's house and he was actually currently living with her. In fact, he had a personal ID, a government ID with that address on it, but the officer still believed he did not belong there because it was not the type of neighborhood that he would presumably exist in, and he was arrested. My mentee was eventually released from jail after some late-night calls I had to make to a judge, which turned into an even later night on my behalf waiting at

¹ See, e.g., Chaz Arnett, *Race, Surveillance, Resistance*, 81 OHIO ST. L.J. 1103 (2020); see also Chaz Arnett, *From Decarceration to E-carceration*, 41 CARDOZO L. REV. 641, 720 (2019).

² INVESTIGATION OF THE FERGUSON POLICE DEPARTMENT, U.S. DEP'T OF JUST. CIV. RTS. DIVISION 4-5 (Mar. 4, 2015), https://www.justice.gov/sites/default/files/opa/press-releases/attachments/2015/03/04/ferguson_police_department_report.pdf [<https://perma.cc/5RVP-BL8R>].

³ See, e.g., ALEXANDRA NATAPOFF, *PUNISHMENT WITHOUT CRIME: HOW OUR MASSIVE MISDEMEANOR SYSTEM TRAPS THE INNOCENT AND MAKES AMERICA MORE UNEQUAL* (2018).

the jail to ensure his release. The case was dismissed, but it was an arrest, a mark on his record, and to some degree, more importantly, a reminder that even if he was legally allowed to be someone, and to be somewhere, the *suspicion* that he was not allowed the state to exercise that type of control over his body. In fact, he was only released that night because, as the officer arrested him, he was able to somehow call me on the phone before they took the phone away and because he had an attorney for a mentor who knew who to call and how to pressure for his release. There is an infrastructure in this country that confirms and maintains the devaluation of Black and Brown lives and its reflection in the criminal process depends in large part on misdemeanor cases.

What can public defenders do about this? Or how do they, as I explore, in a way end up unknowingly contributing to it? The reality is that the common public defender workload is so enormous that individual public defenders and the institutions that house them have to triage their client caseloads or pick which clients they will provide services to and when. Sometimes this triage means that a client will not receive any resources, but more often, it means that some clients fall into a gray zone where they only receive some of the available resources. Which resources they receive will depend on what public defender administrators think they deserve; this is where misdemeanors suffer a unique burden.

We can think about two types of cases: misdemeanors, which carry a maximum sentence of one year in jail, and felonies, which can carry up to life in prison. We can also think about two types of public defender lawyering: one, an adequate lawyer who fulfills the Sixth Amendment mandate for the effective assistance of counsel, and two, a better lawyer — a lawyer with experience who can provide some type of representation above the minimal standard. With these two sets of definitions, we can articulate three ways to match them. We can match these two with random assignments, so that sometimes the better and more experienced lawyer goes to represent the client charged with the felony offense and sometimes the better and more experienced lawyer goes to the client charged with the misdemeanor offenses. We can also be strategic in a way that enables the clients charged with felonies to have sole or primary access to the better and more experienced lawyers, or we could, conversely, be strategic in a way that enables the clients charged with misdemeanors to have sole or primary access to the better and more experienced lawyers. Studies show, and we can intuitively accept, that better, more experienced lawyers improve outcomes for clients in all types of cases, whether they are resolved by dismissal, trial,

or plea agreement.⁴ Defendants represented by more experienced attorneys are more likely to avoid incarceration, and even where a prison sentence is assessed, it is shorter than average. There are very real societal consequences when the public defender, who is responsible for representing almost 80% of defendants in criminal court, depending on the study that you follow, chooses one of these matching schemes for about 80% of the potential caseload.⁵

Right now, some public defender offices actually divide their attorneys by experience level and divide types of cases by increasing potential punishment.⁶ Those offices can then assign their least experienced attorneys to the misdemeanor cases and the more experienced attorneys go to the felonies. This choice seems to make sense to them because of how they view felonies in comparison to misdemeanors. They think of misdemeanors as less consequential when you compare them to felonies and that any potential benefit gained by emphasizing misdemeanor offenses is outweighed by the benefit of emphasizing felonies. Basically, if a client charged with a misdemeanor offense is randomly assigned an experienced attorney, that's fine and that's acceptable, but if an office is going to be strategic about how it parcels out the beneficial resource of attorney experience, then it's going to dedicate it to felony offenses. That logic, however, is — to put it as simply as I can — a relic of the past. Felony offenses may place a defendant at risk for a significantly longer prison sentence than misdemeanors, but misdemeanors are no longer as harmless as we once assumed them to be. And as current research shows us, they have deleterious effects on the stability and strength of communities of color.⁷ Collateral consequences increase the punishments associated with misdemeanor convictions. Low-level misdemeanor drug convictions can cause an individual and their entire family to be evicted from public housing, even if the offender is not the leaseholder. These offenses can also formally bar an offender from certain types of employment or pursuing professional licensing. They can be bars to obtaining citizenship or have drastically negative consequences for immigration proceedings. It may be true that many, if not all, of these collateral consequences are also assigned to felony offenses and sometimes are even harsher, but if we consider the sheer scale of

⁴ See Irene Oritseweyinmi Joe, *Rethinking Misdemeanor Neglect*, 64 UCLA L. REV. 738, 740-42 (2017).

⁵ *Id.* at 756-779.

⁶ See John B. Mitchell, *Redefining the Sixth Amendment*, 67 S. CAL. L. REV. 1215, 1270-73 (1994) (assessing “seriousness” as a criterion for the triage of cases).

⁷ *Supra* note 4.

misdemeanor offenses, we have to consider the larger effect collateral consequences for misdemeanors have in the aggregate, and how that should shift our understanding of the importance of misdemeanors in the public defender caseload.

As previously stated, misdemeanor offenses make up 80% of criminal court; that is a significant majority that deserves more attention than it's currently receiving in the analysis simply due to the scale. So, what should public defender institutions do? How might they operationalize a shifting emphasis to misdemeanors? A defender agency could focus its limited resource of attorney experience on misdemeanor cases in a number of ways. For one, it could simply adopt a distribution scheme where the more experienced attorneys represent a certain type or subset of misdemeanors that have a particularly strong impact in their client population or the communities the institution serves. It could also just refrain from removing experienced attorneys from misdemeanor courtrooms and allow them to receive misdemeanor assignments as part of their general caseload. I caution against this latter approach because any change will require a culture shift to some degree where misdemeanor representation in public defender offices is always valued, and until that shift occurs, a mixed caseload for a defender could encourage that defender to simply spend the majority of their effort on their felony assignments and only provide what is remaining to their misdemeanor caseload. That is something we would have to work against, but that method of distribution could be a key step in shifting the cultural mindset about the importance of misdemeanor representation.

This discussion of reconsidering misdemeanor case assignments to ensure that the public defender solution is not neglecting them is one way that public defenders might change their practice to hold back from contributing to racial inequities in the criminal process. The second way is how the institution deals with trauma for its employees. I am going to give a trigger warning right now for the rest of this talk, as some of the discussions will include descriptions of self-harm or other mental health challenges. Thankfully, there is growing discourse, at least amongst the bar, about the impact of trauma among lawyers. It is focused on what we call "secondary trauma." I'll use this definition of secondary trauma to put us all on the same page: it is defined as the stress resulting from helping or wanting to help a traumatized or suffering person. Some experts refer to it as vicarious trauma, or the cumulative transformative effect of working with survivors of traumatic life events. All professionals who work with and/or assist traumatized or distressed people are at risk of suffering from secondary trauma.

Some of you may not be as familiar with the particulars of the criminal justice system, but oftentimes both victims and defendants are traumatized. As just a few examples, we can examine the background of some defendants facing the death penalty. It is far too easy, and I'd say erroneous, to say that somebody is inherently evil and that is why they killed somebody. Indeed, that kind of a mistake is why the accused have lawyers assigned to their case so that somebody can see and present the sum total of who they are, not just what might have been the worst moment of their life, the worst decision they've ever made, and the worst thing they've ever done, as unimaginable as that might have been. Indeed, this belief was reinforced during my experience doing death penalty work in Alabama and homicide trials as a public defender in New Orleans. As painful as the loss of human life is that may have led to the criminal charge, conviction, and sentence, reviewing the background of the accused offender often brought to the forefront the violent abuse, whether it was emotional, mental, or physical, in the accused's past. And even in the rare case where that history was not clearly evident, as you learned more about your client and got to know them more, it could be even more impossible to separate their experience as your client from what seemed to be society's devaluation of them as a human being.

I remember talking with a client who I represented on a homicide charge about how embarrassed he was that he was not really good at reading. I remember those conversations about there being a lot of turmoil in his childhood, which meant he was not in a position to really focus and learn in grade school. Sometimes during the delays in court, I would take the time out to help him sound out some of the words in the magazine article I brought along or try to adopt strategies to be a better reader. So, it can be hard, what ten to fifteen years later, not to think on a random Monday afternoon, as someone who loves reading herself, about how much harder it must be for him to practice his reading or feel good about his reading now that he is serving a life sentence. Those seem like minor things, but they can be hard to witness and experience for the lawyer, and they make this scholarly endeavor to really explore and understand secondary trauma for public defenders and other support staff very important. As you do the work, sometimes you learn about the abuse your client experienced or you witness their struggles of being currently incarcerated or fearing the outcome of a trial, and you cannot help but wonder if you are playing a part in the abuse by not being able to get the trial outcome you're fighting for. I did a study and issued a report with Ben Miller of the Justice Collaborative Institute this past summer called *When Every Sentence Is a Possible Death*

*Sentence*⁸ where we asked public defenders to tell us about their experience doing the work during the pandemic. Some of the things they told us were clear signs of the kind of traumatic injury that can arise from doing public defender work.

Some quotes that were shared include: “I’m in a vicious cycle of fear, loneliness, and suffocating guilt that I’m not doing more.” “I am worried my clients are going to contract the virus and die in jail and it would be on my shoulders because I couldn’t successfully convince the judge to release them. Sometimes I scream at my poor husband about the injustices; sometimes I call my colleagues and cry.” “I feel a sense of hopelessness and powerlessness as those who hold power are not taking this moment to show grace and compassion, but instead, treat our clients and their rights as secondary and disposable.” “I try to remain hopeful, but I’m struggling to have faith that America can be decent.” “It’s extremely stressful to know that I’m the weak link in my loved one’s isolation. . . .” One public defender described how they cried “in my office before I ever even got to court.” “Last week, I had a phone call with a new client with an intellectual disability and mental illness who was actively suicidal and doesn’t understand why he’s in prison.” “He doesn’t have anyone he trusts to talk to, and I couldn’t be there in person to talk with him and sit with him and see his face and let him see mine.” “The job is stressful every day. Adding the worry about catching this [virus] and taking it home to my children is too much. I can’t sleep. I’m not taking care of myself. It’s all too much.”⁹

This was just a small sampling of some of the things these public defenders told us. The entire report is available online if you’d like to see it and read some of the other comments. Now, it’s true this global pandemic and moment of national reckoning on race and police use of force may feel different and unique to many people, but the feelings of inadequacy and fear that you are the reason why your client will suffer is, for public defenders, not limited only to this time. Scholars have written about burnout in the public defender for decades, and some offices have started to work to think through how to address that. The other strand of my research involves figuring out the best method of care for public defenders given this reality. This research area requires

⁸ IRENE ORITSEWEYINMI JOE & BEN MILLER, WHEN EVERY SENTENCE IS A POSSIBLE DEATH SENTENCE: PUBLIC DEFENDERS SPEAK FROM THE FRONT LINES ABOUT COVID-19, THE JUST. COLLABORATIVE INST. (Apr. 2020), https://tjcinsitute.com/wp-content/uploads/2020/04/20.04_PD-in-COVID19-Crisis.pdf [<https://perma.cc/8KUA-WXG5>] (individual responses on file with author).

⁹ *Id.* at 4, 5, 6.

a lot of collaboration with mental health professionals and is in its nascent stages, but it makes sense for me to discuss it briefly here.

What I am trying to do with these projects is use the common experiences or motivations that exist in public defender practice to devise certain practices or resources public defender institutions should have in place to comply with basic employment requirements of supporting and maintaining the health of employees. In devising a method, I've been looking at what Jeff Sherr, the training director of the National Association of Public Defenders, calls the three motivations for public defender work. He notes that, in devising these motivations, he's pulling from the work of visionaries and luminaries like Professors Charles Ogletree and Evan Smith. According to his model, there are three basic motivations that lead someone to work as a public defender, which can be tracked to three different quotes. The first is by Friedrich Nietzsche, "Mistrust all in whom the impulse to punish is powerful."¹⁰ The second is by Sister Helen Prejean, "People are more than the worst thing they've ever done in their lives."¹¹ And the third is by Margaret Mead, "Never doubt that a small group of thoughtful committed citizens can change the world; indeed, it's the only thing that ever has."¹² Jeff's thought is that these quotes tack onto different personality types and motivations for being a public defender. The first is the warrior. These are people who are angry at the existence of an all-powerful government that would use its might to go after a less powerful person in an unfair fight. These warriors might have the mantra, "to get to my client you have to go through me." The second is the social worker. These are people who see all of the struggles of their clients and want to do what they can to help that person live a more complete and gratifying life going forward. They see the individual as the sum total of their experiences in their environment and want to counsel them in a way that helps move them past those limitations. The third is the movement builder, people who are dedicated to creating a system that is more just and more consistent with how a process that is fair should actually operate.

¹⁰ FRIEDRICH NIETZSCHE, *THUS SPAKE ZARATHUSTRA* 75 (2003) (ebook).

¹¹ See *generally* DEAD MAN WALKING: THE EYEWITNESS ACCOUNT OF THE DEATH PENALTY THAT SPARKED A NATIONAL DEBATE, SISTER HELEN PREJEAN (1993).

¹² Although popularly attributed to Margaret Mead, there is some discussion she may not be directly responsible for this quotation verbatim. The speech attributes the quote to Margaret Mead in recognition of the popular attribution. See JONATHAN RAPPING, *GIDEON'S PROMISE: A PUBLIC DEFENDER MOVEMENT TO TRANSFORM CRIMINAL JUSTICE* 117-118 (2020).

Now, my thought is in taking these different types of motivations, we can devise different methods to care for the mental health of the different sort of archetypal public defenders. The truth is that life will get hard for the warrior in a public defender office because you will lose a lot. There is a really popular theory of public defense that says that if the system is working, public defenders should be losing all the time. Not for reasons like they do not have time to prepare, or they do not have the resources they need to provide an adequate defense, but because we're supposed to have these constitutional checks and barriers along the criminal process path that knock out cases before they even get to the public defender. From the Fourth Amendment's admonition against unlawful searches and seizures, to the prosecutor's charging decision being supported by probable cause or proof beyond a reasonable doubt, and in some cases, to the judge's determination of the sufficiency of the evidence. With that in mind, maybe for the warrior, care would involve exploring ways to emphasize other victories in the process. For the social worker, it can be the hardest when they feel far too limited in the ways in which they can help a person's environment. Perhaps, this is why you do not have the public defender institution operating in a vacuum. How about coordinating with other public interest groups or similar institutions that focus on caring for the individual outside of the criminal court process, to do things like improving access to education, healthcare, housing, and other conditions. Then for the movement builder, some of the ways to care for them might be through providing more information about the actual growth and change inspired by the public defender's work. Maybe that is through annual reports, client updates, or family updates of clients that show improvement, or even by just clearly articulating the goals for the movement builder and defining the small checkpoints of success along the way. This might help to redefine what success looks like as the movement builder tries to do something to change the world as they see it.

In addition to my work on secondary trauma, I also spent some time thinking about another type of more direct trauma in public defender offices that exists along racial dimensions. With this study, I recognize that experiencing life as a public defender is going to be different for every public defender in every public defender institution. But I do think there is a particular type of trauma that occurs for its African American and Latinx staff, who are working in an environment that constantly reinforces the truth of this system: that it treats people differently based on race and that African American and Latinx people suffer the most from that. To my mind, this means that public defender

leadership should pay particularly close attention to the experiences of the African American and Latinx members of its staff. The work is hard for everybody, I can't stress that enough; I understand it myself enough. We are exploring that fact even more right now, but there is a particular type of pain and mental health challenge involved when working to help people who look like you and who share similar experiences interacting with the world as you do. I learned this lesson very dearly in 2014 from a very close friend of mine, another Black female who ended up taking her own life. We'd been at the public defender's office in New Orleans together, but I left to pursue academia and she left to do more policy-related work with the Vera Institute, but we were still good friends and shared a bond you can only really share with other people who worked in the kinds of conditions we often worked in at the New Orleans Public Defenders.

I remember her driving me once all night to a beach house that a friend of hers owned in Destin, Florida after I lost a particularly draining murder trial. I still have the Facebook post of the picture she took of me passed out on the beach. I'm not going to share that picture as part of this PowerPoint because it's rather embarrassing, of course, but it also makes me smile because I'm laid out on that beach with my arms spread out and getting that kind of good sleep you get when you've just been through a lot, and she captioned the picture about how it was priceless to see me totally relaxed for once. She knew in that moment that I needed to get out of the city and she made it happen for me, but she was also struggling herself. She had actually gone back to that house in Destin a few days before she took her life and messaged me from that beach to reminisce about the trip, and I laughed as we went over the memories, not realizing that was her goodbye. She wrote a message for us to read after she had passed, and in it she clarified that she knew she was suffering from mental health challenges; she clearly articulated how, as hard as she was working to take care of her mental health, it was particularly hard to feel like her life mattered when she spent all day fighting against a large and pervasive system that repeatedly told her in various ways that the lives of people who looked like her, who sounded like her, who thought about the world like her, didn't matter. I think what called her to criminal justice work was the same sort of compassion that ultimately contributed to ending her life, and her experience makes me wonder how much attention public defender leadership pays to the particular experience of its Black and Brown staff and what steps can be taken to create a healthier environment for them. She wasn't the only person I worked with in New Orleans who struggled with their mental health; there were people who had public mental

health crises, who had substance abuse problems, and some who died those deaths of despair that we hear about occurring in places where society has made life very difficult. The ABA has gathered really meaningful data on the incidence of depression and substance abuse for attorneys as a whole, and one of my goals is to get that same sort of reliable data for those working in public defender institutions.

These are just a few of the studies that I'm working on right now as part of my effort to better understand racial dynamics in the criminal process. To close off my comments in this talk so I can take questions and we can have a discussion, let me emphasize that my claims about how the public defender falls short are not meant to diminish the very significant role that the lack of secure, stable, and sufficient funding for the public defender institution plays in maintaining the racial inequities in the system. It's not meant to reduce our study of how prosecutorial charging decisions should better reflect the needs of the community and not the explicit or implicit bias of those making the decisions. It's also not supposed to downplay the role that judges hold in protecting the rights of the accused in the criminal process. Those all play a significant part in addressing the racial bias and racialized outcomes of the criminal process. My hope, however, is that my course of study gives us some areas of consideration in which public defenders can aim for improvement on their own without having to rely on complete buy-in from other system actors. I know that in my days in practice it felt good to feel like I had some say or control in how I practiced law and to learn ways to do it better. So, it's probably not a surprise that my work as an academic now involves exploring ways to achieve that in the system despite the size and control of the entity. Thank you very much for listening to my words and I look forward to your questions in our discussion.