

**U.S. House of Representatives
Committee on the Judiciary
Subcommittee on Crime, Terrorism, and Homeland Security
“Reauthorization of the Violence Against Women Act”
Thursday, March 7, 2019
10:00am – 2141 Rayburn House Office Building**

**Written Testimony of Professor Sarah Deer
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The Honorable Chairman Jerrold Nadler, Ranking Member Doug Collins, Chairwoman Bass, Ranking Member Ratcliffe and Members of the Committee,

Mvccv nettv ce homv hueret cem kerkuecetv vm pohateckat, mvto cekicis. Svcvfvckes.¹

I would like to express my deep appreciation and thanks for inviting me to testify before this Subcommittee on the Reauthorization of the Violence Against Women Act (VAWA). I am a citizen of the Muscogee (Creek) Nation and currently hold the position of Professor at the University of Kansas and serve as the Chief Justice of the Prairie Island Indian Community Court of Appeals. Today I am testifying in my personal capacity.

I have had the good fortune to work with VAWA since its inception in 1994, when I was an undergraduate rape crisis volunteer counselor for a local community program. Our center’s first VAWA grant made it possible for us to hire a second staff member for the first time in history, which allowed us to provide emergency service and court accompaniment for many more survivors than we could have previously.

After I finished law school in 1999, I worked as a grant manager in the Office on Violence Against Women (OVW) for three years, where I was able to see first-hand the various ways that VAWA was making a real difference on the ground. I saw tribal victim services programs begin to develop across the country. Both the funding and statutory provisions of VAWA were – and are – making life-and-death differences for Native people. Later, I joined the staff of a Native owned-and-operated non-profit organization, the Tribal Law and Policy Institute where I continued to develop relationships with tribal recipients of VAWA funding through our role as a technical assistance provider under VAWA.

For the past 11 years, I have been a college professor, where my research continues to focus on the successes of VAWA; namely, how tribal governments have benefited from the changes in federal law that have come through VAWA as well as the Tribal Law and Order Act (TLOA) of 2010. My research and writing continue to focus on concrete solutions to the violent crime crisis in Indian country. It is in this capacity that I address you today.

¹ Translation from the Mvskoke language: “I thank you for inviting me to stand before you to testify today. I am happy with this invitation.”

Each time VAWA has been reauthorized it has included important provisions aimed at increasing safety for Native victims. The last reauthorization of VAWA in 2013 was a particularly groundbreaking law that addressed numerous concerns that had been raised by Native women and their allies for decades. From a tribal perspective, it was the most important reauthorization of VAWA to date because it created fundamental structural changes to Indian law by reaffirming tribal jurisdiction that had been wrested from tribal control under questionable circumstances.

Despite the tremendous success of VAWA 2013, there is more work to do. I will focus my testimony on areas where VAWA can continue to be strengthened to do even more to protect the lives of Native people throughout the United States.

In short, tribal nations and Native women are only asking for a restoration of the criminal authority that is currently exercised by all other sovereigns in this country – local, state, and federal. Tribal nations seek to be able to protect their own people from violence, one of the most important functions of any government. Former Assistant Secretary of Indian Affairs, Kevin K. Washburn, once wrote, “[A] community that cannot create its own definition of right and wrong cannot be said in any meaningful sense to have achieved true self-determination.”² As you consider the various jurisdictional proposals that will come forth in the coming legislative session, I ask that you put yourself in the position of a government official who is not allowed to protect her own people or not permitted to enforce her own laws against certain criminals. Changes to VAWA will save not only lives, but will also improve the capacity of tribal governments to fully function as sovereigns, which in turn saves lives.

STATISTICS: WHAT WE KNOW

The Department of Justice’s own statistics continue to reveal a tragic reality – that Native women are living lives marked by repeated, continued violence. According to the most recent data from the National Institute of Justice, more than 4 in 5 American Indian and Alaska Native women (84.3 percent) have experienced violence in their lifetime.³ More than half (56.1%) will experience some form of sexual violence.⁴

American Indian and Alaska Native women are also significantly more likely to have experienced violence by an interracial perpetrator and significantly less likely to experienced violence by an intraracial perpetrator when compared to non-Indian victims.⁵ According to the Centers for Disease Control and Prevention, homicide is the sixth leading cause of death among American Indian and Alaska Native women between 10 and 24 years of age and the seventh leading cause of death for American Indian and Alaska Native women between 25 and 34 years of age.⁶ Native lesbian, bisexual, and Two

² Kevin K. Washburn, *Federal Criminal Law and Tribal Self-Determination*, 84 NORTH CAROL. LAW REV. 779, 779 (2006).

³ André B. Rosay, *Violence Against American Indian and Alaska Native Women and Men: 2010 Findings from the National Intimate Partner and Sexual Violence Survey 2* (National Institute of Justice Research Report, May 2016), <https://www.ncjrs.gov/pdffiles1/nij/249736.pdf>.

⁴ *Id.*

⁵ *Id.*

⁶ Centers for Disease Control and Prevention, “Leading Causes of Death (LCOD) by Age Group, American Indian/Alaska Native Females – United States, 2015,” <https://www.cdc.gov/women/lcod/2015/native/index.htm>.

Spirit women experience high rates of sexual (85 percent) and physical (78 percent) assault.⁷ Predictably, the high level of violence and limited access to services has devastating social, health, and financial consequences.

BARRIERS TO SAFETY

A. Jurisdiction

As detailed by the federally-chartered 2010 Indian Law and Order Commission, in contrast to states and localities which have primary responsibility for criminal justice in their communities, tribal governments are legally prevented from providing such protection due to a 200-year old exceedingly complicated web of jurisdictional rules and sentencing limitations.⁸

Jurisdiction over a crime in Indian country depends upon the Indian status of the offender, the Indian status of the victim, the location of the crime, the nature of the crime, and within what state the tribal government is located.⁹ Even when a tribal government does have jurisdiction over a crime, sentencing limitations imposed by federal law prevent tribal governments from meting out sentences appropriate for major crimes.¹⁰ Tribal governments are subsequently forced to cede prosecution to a concurrent jurisdictional sovereign, oftentimes encountering a lack of accountability and an unwillingness to prosecute.¹¹ Parties must often travel far outside of their communities to access criminal justice; Native defendants are often not tried by a jury of their peers; and tribal community members' and outsiders

⁷ Keren Lehavot, Karina Walters, and Jane Simoni, "Abuse, Mastery, and Health Among Lesbian, Bisexual, and Two Spirit American Indian and Alaska Native Women," 15(3) *CULTUR. DIVERS. ETHNIC MINOR PSYCHOL.* 275-284 (2014), www.ncbi.nlm.nih.gov/pmc/articles/PMC4059821/

⁸ INDIAN LAW AND ORDER COMMISSION, *A ROADMAP FOR MAKING NATIVE AMERICA SAFER: REPORT TO THE PRESIDENT & CONGRESS OF THE UNITED STATES* 151 (2013), www.aisc.ucla.edu/iloc/report/.

⁹ The General Crimes Act, 18 U.S.C. § 1152 (providing that federal courts have jurisdiction over interracial crimes committed in Indian country); the Assimilative Crimes Act, 18 U.S.C. § 1; the Major Crimes Act, 18 U.S.C. § 1153 (providing federal criminal jurisdiction over ten enumerated major crimes committed in Indian country that is exclusive of the states); Public Law 83-280, 18 U.S.C. § 1162 (delegating federal jurisdiction to six states over most crimes throughout most of Indian country within their state borders); *Oliphant v. Suquamish Indian Tribe*, 435 U.S. 191 (1978) (holding that tribes lack criminal jurisdiction over non-Indian defendants); Violence Against Women Reauthorization Act of 2013, S. 47, 113th Congress, Title IX (2013) (expanding tribal criminal jurisdiction to non-Indians for the crimes of domestic violence, dating violence and the violation of protection orders so long as the defendant has certain ties to the community and the tribe provides certain due process protections).

¹⁰ ILOC REPORT, 21. Indian Civil Rights Act, 25 U.S.C. §§ 1301-1304 (limiting a tribe's sentencing authority to a term of imprisonment of 1 year, or up to 3 years so long as the tribe provides five additional due process protections).

¹¹ From 2005-2009, the Government Accountability Office (GAO) found that U.S. Attorneys declined to prosecute nearly 52% of violent crimes in Indian country. U.S. GAO, *U.S. Department of Justice Declinations of Indian Country Criminal Matters*, Report No. GAO-11-167R, 3 (2010). Prior to the enactment of TLOA, United States Attorneys were not required to report their declination rates. Section 212 of TLOA now requires that they submit an annual report to Congress detailing their declination rates. According to their first report, United States Attorney Offices declined to prosecute 37% of all Indian country submissions for prosecution in 2011, and 31% in 2012. U.S. Dep't of Justice, *Indian Country Investigation and Prosecutions 2011-2012* 5 (2013).

lack confidence in tribal governments' ability to maintain law and order in Indian country.¹² The result is that Native people today experience disproportionate rates of violent crime in their communities.¹³

Up until 1978, tribal governments retained and exercised their inherent sovereignty to criminally prosecute all persons, including non-Indians. The *Oliphant* case unilaterally denied all tribes of that sovereign right through the mystifying reasoning of implicit divestiture.¹⁴ With the overwhelming majority of violence Native women committed by non-Indians, the lack of tribal jurisdiction over non-Indian offenders on tribal lands continues to be a key reason for the disproportionate violence against American Indians and Alaska Natives.

B. Resources

Tribal governments often have limited resources available to provide services to victims. Until last year, tribal governments had not received an annual allocation from the Crime Victims Fund, the federal government's primary funding source for crime victims services. As a result, crime victims on tribal lands still struggle to have even their most basic needs addressed.

THE 2013 REAUTHORIZATION OF VAWA: SMALL STEPS

In the six years since VAWA was reauthorized in 2013, over two dozen tribal governments now exercise criminal jurisdiction over non-Indians and several dozen more are in varying stages of planning to implement the law.

From 2013 to 2018, the implementing tribes reported making 143 arrests of 128 non-Indian abusers. These arrests ultimately led to 74 convictions, 5 acquittals, and as of 2018, there were 24 cases then pending. There has not been a single petition for habeas corpus review brought in federal court in a special domestic violence criminal jurisdiction (SDVCJ) case. Although some argued, prior to VAWA 2013's passage, that tribal courts would be incapable of fairly implementing SDVCJ, the absence of even a single habeas petition in the first five years reveals that those arguments were unfounded and likely based on prejudice alone.

The National Congress of American Indians has issued a report summarizing tribal SDVCJ experiences that shows the true difference that the 2013 Reauthorization has been making on the ground for Native victims. I encourage you to review this report in its entirety as the information, data, and analysis contained in the report demonstrates that the reaffirmed tribal criminal jurisdiction in VAWA 2013 (SDVCJ) increased public safety for all of those—both Indian and non-Indian—living on tribal lands and in tribal communities. By all accounts, it has been an incredible success.

While VAWA 2013 SDVCJ has begun to address some of the issues that American Indian and Alaska Native populations face in the United States, it will take more than one piece of legislation to comprehensively address the impact of this significant historical legacy of discrimination and

¹² *Supra* note 8 at 21.

¹³ *Id.* at 3.

¹⁴ *Oliphant v. Suquamish Indian Tribe*, 435 U.S. 191 (1978).

indifference. Native women need and deserve continued support from Congress to ensure that our lives will not continue to be marked by frequent violence.

ADDITIONAL UNADDRESSED JURISDICTIONAL OBSTACLES

Despite these successes, VAWA 2013's SDVCJ has its limitations. VAWA 2013 reaffirmed tribal criminal jurisdiction over only three categories of crimes committed by non-Indians: (1) domestic violence, (2) dating violence, and (3) criminal violations of protection orders.¹⁵ While the reaffirmation of jurisdiction over these crimes has increased safety for some Native women living in their tribal communities, VAWA 2013 did not go far enough in addressing the high rates of violent, sexual, and domestic crimes committed against tribal citizens.

VAWA 2013 still leaves tribal governments without the authority necessary to protect their women, children, and tribal law enforcement over domestic violence crimes committed against children, assaults on police officers, sexual assault, and sex trafficking. I urge this Congress to re-authorize VAWA, now in 2019, with provisions that will ensure tribal governments are able to protect their citizens from these violent crimes that undermine the safety of all living on tribal lands.

A. PROTECTING CHILDREN

I begin by turning to the topic of child abuse. "There is a vital connection between inherent tribal sovereignty and protecting [Native] children,"¹⁶ since Native children "are the future of American Indian and Alaska Native communities [but are currently] destroyed by relentless violence and trauma."¹⁷

Native children, like their mothers, are exposed to very high rates of violence. The Attorney General's Advisory Committee on American Indian and Alaska Native Children report found that "American Indian and Alaska Native children [] suffer exposure to violence at rates higher than any other race in the United States."¹⁸ Indeed, AI/AN youth experience high rates of child abuse: 15.9 per one thousand compared to 10.7 for white youth.¹⁹ As a result, Native "children experience PTSD at the same rates as veterans returning from Iraq and Afghanistan and triple the rate of the general population."²⁰

¹⁵ The SDVCJ allows for tribal jurisdiction for the crimes of dating violence, domestic violence, and the violation of a protection order. 25 U.S.C. § 1304(c). These crimes are defined in § 1304(a).

¹⁶ Byron L. Dorgan et al., *Attorney General's Advisory Committee on American Indian and Alaskan Native Children Exposed to Violence: Ending Violence So Children Can Thrive* 7 (Nov. 2014) http://www.justice.gov/sites/default/files/defending_childhood/pages/attachments/2015/03/23/ending_violence_so_chi ldren_can_thrive.pdf.

¹⁷ *Id.* at 7.

¹⁸ *Id.* at 8.

¹⁹ Neelum Arya & Addie Rolnick, *A Tangled Web of Justice: American Indian and Alaska Native Youth in Federal, State, and Tribal Justice Systems*, 1 Policy Brief and Ethnicity Series 1, 5 (2008), http://www.campaignforyouthjustice.org/documents/CFY_JPB_TangledJustice.pdf.

²⁰ *Supra* note 15 at 7.

It comes as no surprise that in 60 percent of the SDVCJ cases tribal governments have prosecuted against non-Indians since passage of VAWA 2013, children have been victims or witnesses of the violence.

At this time, non-Native people who perpetrate crimes (including sexual assault and murder) against Native children cannot be prosecuted by the tribal government. This injustice must be rectified. Many families living on Indian reservations include both Indians and non-Indians. Native American children deserve to be protected by their local governments—their tribal nations—and that requires that their tribal nations have jurisdiction to intervene and prosecute their abusers. In the next reauthorization of VAWA, I strongly urge Congress to reaffirm authority to tribal governments over all persons who commit acts of violence against Native children on tribal lands.

SDVCJ did not go far enough in this regard. Although children are frequently witnesses to domestic violence or victims themselves, VAWA 2013 currently only authorizes tribal criminal jurisdiction over domestic or dating violence committed against romantic or intimate partners, or a violation of a protection order.²¹ Since it is impossible for children to have an “intimate partner”, this means that all crimes committed against Native children remain outside the jurisdiction of the tribal government. Thus, even with SDVCJ, tribal governments are unable to prosecute non-Indians for many of the crimes against children that are co-occurring with domestic violence unless the children are named in a protection order set forth in VAWA 2013.²²

A recent example from the Sault Sainte Marie Tribe of Chippewa Indians, located in Michigan, illustrates how this gap in the law has real consequences for Native victims. A non-Indian man in an intimate relationship with a tribal member moved in with her and her 16 year-old daughter. After the man began making unwanted sexual advances on the girl, sending inappropriate text messages, and on one occasion groping the daughter, the Tribe charged the defendant with domestic abuse and attempted to tie the sexual assault against the daughter to a pattern of abuse against the mother. The tribal court dismissed the charges for lack of jurisdiction and the defendant left the victim’s home. Four months later, he was arrested by city police for kidnapping and repeatedly raping a 14-year old tribal member. This kidnapping and rape of a minor could have been prevented if the Tribe had been able to exercise jurisdiction in the first case.²³

The inherent jurisdiction of tribal governments to prosecute crimes against their children—regardless of the identity of the perpetrator—must be reaffirmed. A bill introduced by Representatives Cole and O’Halleran, HR 958, the Native Youth and Tribal Officer Protection Act, would amend 25 U.S.C. § 1304 to

²¹ 25 U.S.C. § 1304(c) (2012). The protection order violation must occur in Indian Country and violate the portion of the protection order that “(i) prohibits or provides protection against violent or threatening acts or harassment against, sexual violence against, contact or communication with, or physical proximity to, another person; (ii) was issued against the defendant; (iii) is enforceable by the participating tribe; and (iv) is consistent with section 2265(b) of title 18 of the United States Code.”

²² Kelly Gaines Stoner and Lauren van Schilfgaarde, *Addressing the Oliphant in the Room: Domestic Violence and the Safety of American Indian and Alaska Native Children in Indian Country*, 22 WIDENER LAW REV. 239 (2016), http://widenerlawreview.org/files/2014/09/004_Stoner_FINAL.pdf.

²³ National Congress of American Indians, “VAWA 2013’s Special Domestic Violence Criminal Jurisdiction Five-Year Report,” p. 24 (2018).

reaffirm tribal jurisdiction over certain non-Indians who commit crimes against Native children in Indian Country. I support this bill and encourage you to include similar provisions in VAWA reauthorization legislation.

B. VICTIMS OF SEXUAL ASSAULT, STALKING and SEX TRAFFICKING

VAWA 2013 SDVCJ also left tribal governments without the authority necessary to prosecute crimes of sexual assault, stalking, and sex trafficking, unless the violence occurs within the context of domestic violence. Often, however, Native women are raped, assaulted, or sex-trafficked by non-Indians visiting (or living) on tribal lands with whom they have no consensual relationship. The omission of these categories of crimes from VAWA 2013 has left many of Native women and girls vulnerable to some of the most heinous crimes that can be committed against a woman.

Recall the earlier section on DOJ statistics that concluded that Native women are more likely to be raped or assaulted by someone of a different race. NIJ found that 96 percent of Native women and 89 percent of Native male victims reported being victimized by a non-Indian.²⁴ Similarly, Native stalking victims are nearly 4 times as likely to be stalked by someone of a different race, with 89 percent of female stalking victims and 90 percent of male stalking victims reporting inter-racial victimization.²⁵

The higher rate of inter-racial sexual violence experienced by Native women necessitates remedying the omission of sexual assault and stalking from VAWA 2013. It should be one of your top priorities in this VAWA re-authorization. Without this critical legislative fix, there continues to be impunity for non-Native sexual predators.

The example from the Sault Sainte Marie tribe discussed above illustrates the devastating consequences that can occur when sexual violence is not addressed. A recent example from the Pascua Yaqui Tribe underscores the ways in which limits on tribal authority increase the vulnerability of tribal employees to sexual harassment in the workplace. A female tribal member employed in the tribe's casino was fixing slot machines one evening when a group of drunk non-Indian patrons began harassing her. As the men were being removed by casino security, one of them grabbed the female employee by the genitals and squeezed. Despite having the incident recorded on surveillance video, the tribe was unable to charge the offender, who was a stranger to the victim, with assault.

And in areas with a concentrated presence from extractive industries, Native women and children are sex trafficked at dangerously high rates. For instance, the Office on Violence Against Women noted in 2014 that the "[r]apid development for oil production in the Bakken region has brought a massive influx of itinerant workers and a sharp increase in crime and law enforcement issues, including sex and human trafficking."²⁶

²⁴ "Human Trafficking," Sen. Heidi Heitkamp (last visited Oct. 3, 2016), at 18.

²⁵ *Id.* at 32.

²⁶ U.S. Dep't of Justice Office on Violence Against Women, 2014 Tribal Consultation Rep. 3 (2014).

The increased rates of non-Indian violence perpetrated against Native women in relation to extractive industries is in large part due to the presence of “man camps” on or near reservation lands. Energy companies seeking to engage in natural resource extraction in or near tribal nations necessarily attract large numbers of temporary workers.²⁷ Typically, this large, transient work force is made up almost exclusively of non-Indian men, and the company sets up temporary housing for them in camps consisting of trailers; these camps are known as “man camps.”²⁸ One study of counties affected by the extractive industry, for example, determined that the “frequency of registered sex offenders grew approximately two to three times in areas reliant on energy extraction.”²⁹

One of the more alarming trends correlated with energy development in rural areas is the large numbers of registered sex offenders who are attracted to work in oil fields. In 2015, the U.S. Marshall’s Service and the tribal law enforcement agency at Fort Berthold (in the Bakken) determined that, after the oil boom, almost 20 percent of the sex offenders on the reservation had failed to register with authorities (in violation of tribal and federal law) – compared to a rate of only 4-5 percent for the rest of North Dakota.³⁰

In addition to sexual assault, women living near or around extractive industries are at a much higher risk for human and sex trafficking. Indeed, at the height of the Bakken oil boom, former Senator Heidi Heitkamp (D-ND) called sex trafficking “an unfortunately growing problem in North Dakota, *particularly in the oil patch and in Indian Country.*”³¹ One reported discovered that “for the past 10 years...there were almost no prostitution or sex trafficking-related cases in far western North Dakota until 2011, when there were a dozen.”³²

But when these crimes are perpetrated by a non-Indian, unless or until Congress reaffirms the jurisdiction the U.S. Supreme Court removed in 1978, tribal governments will remain without the

²⁷ Sarah Deer & Mary Kathryn Nagle, *The Rapidly Increasing Extraction of Oil, and Native Women, in North Dakota*, FED. LAW, 34, 35-36 (2017).

²⁸ ANGELA C. ANGEL, *BEYOND THE “ROUGHNECK” STEREOTYPE: REVEALING THE ACTUAL FACE OF MOBILE WORKERS IN THE ALBERTA OIL SANDS AND NORTH DAKOTA’S BAKKEN OIL REGION AND WHY IT MATTERS TO HEALTH*, 6 (2014).

²⁹ Joel Berger & Jon P. Beckman, *Sexual Predators, Energy Development, and Conservation in Greater Yellowstone*, 24 CONSERV. BIOL. 891 (2010).

³⁰ Amy Dalrymple, *Federal, tribal officers check on sex offenders at Fort Berthold*, BISMARCK TRIB. Apr. 19, 2015, https://bismarcktribune.com/news/state-and-regional/federal-tribal-officers-check-on-sex-offenders-at-fort-berthold/article_6d23ab8e-2ea8-55af-b63f-e662dfae9eff.html [<https://perma.cc/XT9W-DDN9>] (last visited Dec. 21, 2018).

³¹ “Human Trafficking,” Sen. Heidi Heitkamp (last visited Oct. 3, 2016), <http://www.heitkamp.senate.gov/public/index.cfm/human-trafficking>.

³² Pam Louwagie, *Sex trade follows oil boom into North Dakota*, STAR TRIB., Sept. 21, 2014, <http://www.startribune.com/aug-30-sex-trade-from-oil-boom-mostly-unchecked/273268991/> [<https://perma.cc/9JMS-SZD4>] (last visited Dec. 21, 2018); (noting that “with the oil boom overwhelming everything here for the past few years, understaffed local law enforcement has let much of the sex-trade go unchecked, unwilling to pour time into what some view as low-level victimless offenses...The region has been unprepared for the results, with no safe houses specifically to help victims, no service geared toward them and no advocacy groups.”).

authority necessary to protect their women from the crimes of sex and human trafficking that often times accompany expansive extractive industries.

Senators Murkowski and Smith have introduced a bill, S. 288, Justice for Native Survivors of Sexual Violence, that would amend 25 U.S.C. § 1304 to include sexual assault, stalking, and trafficking crimes committed in Indian Country to the scope of criminal conduct that could be prosecuted in tribal court. I support this bipartisan legislation and encourage you to include similar provisions in VAWA reauthorization legislation.

C. TRIBAL LAW ENFORCEMENT

VAWA 2013 is also structured in a way that has created a particularly appalling gap for tribal law enforcement safety. Because the law is limited to crimes of domestic or dating violence or criminal violations of protection orders, tribal governments cannot prosecute assaults committed against tribal law enforcement officers who are acting within their authority to enforce those laws. A non-Indian properly arrested by tribal police for domestic violence cannot be held accountable by the tribe for crimes committed against criminal justice officials or other interference in the criminal justice process. These crimes might include resisting arrest, assaulting an officer, witness tampering, juror intimidation, or obstruction of justice. Several of the Tribes implementing VAWA SDVCJ have reported assaults on their law enforcement when responding to a domestic violence call. However, unless or until tribal jurisdiction is acknowledged, non-Indian perpetrators of domestic violence can continue to assault tribal law enforcement (as well as officials and Judges of courts) with impunity.

For our law enforcement, like state and federal law enforcement, a domestic violence call is one of the most dangerous calls they will be asked to answer.³³ Continuing to place our law enforcement in these dangerous and vulnerable situations without the authority to arrest those who attempt to commit crimes against them is unconscionable and undermines the security of all who live in our communities.

HR 958 would also address this significant gap in VAWA 2013. I encourage you to incorporate these provisions of HR 958 into VAWA reauthorization legislation.

CONCLUSION

Members of the Committee, the next reauthorization of VAWA can turn the corner on violence against Native women. I urge you to heed the call of the thousands of victims who deserve justice.

Mvto (Thank you)

³³ Nick Breul and Desiree Luongo, "Making It Safer: A Study of Law Enforcement Fatalities Between 2010-2016," U.S. Dep't of Justice, Community Oriented Policing Services (COPS) and National Law Enforcement Officers Memorial Fund (2017), <https://ric-zai-inc.com/Publications/cops-w0858-pub.pdf>.