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## SENATE COMMITTEE ON PUBLIC SAFETY

Senator Aisha Wahab, Chair

2023 - 2024 Regular

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**Bill No:** SB 36                      **Hearing Date:** March 14, 2023  
**Author:** Skinner  
**Version:** February 14, 2023  
**Urgency:** No                                      **Fiscal:** Yes  
**Consultant:** SC

**Subject:** *Out-of-state criminal charges: prosecution related to abortion, contraception, reproductive care, and gender-affirming care*

### HISTORY

**Source:** Black Women for Wellness  
Coalition of California Welfare Rights Organizations  
Equality CA  
NARAL Pro-Choice California  
VALOR  
Western Center on Law and Poverty

**Prior Legislation:** SB 107 (Wiener), Ch. 810, Stats. 2022  
AB 1242 (Bauer-Kahan), Ch. 627, Stats. 2022  
AB 2043 (Jones-Sawyer), Ch. 768, Stats. 2022  
AB 2029 (Ammiano), Ch. 747, Stats. 2012

**Support:** Access Reproductive Justice; American Atheists; California Attorneys for Criminal Justice; California Public Defenders Association; Ella Baker Center for Human Rights; John Burton Advocates for Youth; Oakland Privacy; Young Women's Freedom Center

**Opposition:** Concerned Women for America; Right to Life League

### PURPOSE

*The purpose of this bill is to:*

- 1) Prohibit a magistrate from issuing a warrant for the arrest of a bail fugitive whose alleged offense or conviction is for the violation of another state's laws that criminalize abortion, contraception, reproductive care, or gender-affirming care that is otherwise lawful under the laws of this state, regardless of the individual's location;*
- 2) State that it is a misdemeanor for a bail fugitive recovery agent or bail bondsman to take into custody a bail fugitive whose alleged offense or conviction is for the violation of another state's laws that criminalize abortion, contraception, reproductive care, or gender-affirming care that is otherwise lawful under the laws of this state and makes them ineligible for a license to operate in California;*

- 3) ***Prohibit a state or local law enforcement agency from providing information or assistance to specified entities regarding legally protected health care activity, which includes abortion, contraception, reproductive care, or gender-affirming care that is otherwise lawful under the laws of this state; and,***
- 4) ***State that a person who is fleeing to avoid prosecution, or custody and confinement after conviction, for the above-described acts, is not ineligible for the California Work Opportunity and Responsibility to Kids (CalWORKs) program, regardless of the recipient's location.***

*Existing law* establishes the Reproductive Privacy Act which provides that the Legislature finds and declares that every individual possesses a fundamental right of privacy with respect to personal reproductive decisions, which entails the right to make and effectuate decisions about all matters relating to pregnancy, including prenatal care, childbirth, postpartum care, contraception, sterilization, abortion care, miscarriage management, and infertility care. Accordingly, it is the public policy of the State of California that:

- Every individual has the fundamental right to choose or refuse birth control;
- Every individual has the fundamental right to choose to bear a child or to choose to obtain an abortion, with specified limited exceptions; and,
- The state shall not deny or interfere with a person's fundamental right to choose to bear a child or to choose to obtain an abortion, except as specifically permitted. (Health & Saf. Code § 123462.)

*Existing law* provides that the state may not deny or interfere with a person's right to choose or obtain an abortion prior to viability of the fetus or when the abortion is necessary to protect the life or health of the person. (Health & Safe. Code § 123466, subd. (a).)

*Existing law* states that a person shall not be compelled in a state, county, city, or other local criminal, administrative, legislative, or other proceeding to identify or provide information that would identify or that is related to an individual who has sought or obtained an abortion if the information is being requested based on either another state's laws that interfere with a person's rights under subdivision (a) or a foreign penal civil action. (Health & Saf. Code, §123466, subd. (b).)

*Existing law* prohibits, under the Confidentiality of Medical Information Act (CMIA), providers of health care, health care service plans, or contractors, as defined, from sharing medical information without the patient's written authorization, subject to certain exceptions. (Civ. Code § 56 et seq.)

*Existing law* authorizes a magistrate to issue an arrest warrant, upon application by a bail bondsman, for a person who has been admitted to bail in another state, escapes bail, and is present in this State and after a hearing, issue an order to return the fugitive to the jurisdiction from which they escaped. (Pen. Code, § 847.5.)

*Existing law* makes it a misdemeanor for a bail bondsman to take a fugitive into custody without a warrant from a magistrate. (Pen. Code, § 847.5.)

*This bill* prohibits a magistrate from issuing an arrest warrant for an individual whose alleged offense or conviction is for the violation of laws of another state that criminalizes an individual performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming care if the abortion, contraception, reproductive care, or gender-affirming care is lawful under the laws of this state, regardless of the recipient's location.

*This bill* states that a bondsman or person authorized to apprehend, detain, or arrest a fugitive admitted to bail in another state who takes into custody a fugitive admitted to bail in another state whose alleged offense or conviction is for the violation of laws of another state that authorizes a criminal penalty to an individual performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming care if the abortion, contraception, reproductive care, or gender-affirming care is lawful under the laws of this state, regardless of the recipient's location, without a magistrate's order, is ineligible for a license to be a bail fugitive recovery agent and shall forfeit any license already obtained.

*This bill* authorizes a person who is taken into custody by a bail agent in violation of this bill's provisions to institute and prosecute a civil action for injunctive, monetary, or other appropriate relief against the bondman and bond company within three years after the cause of action accrues.

*Existing law*, starting July 1, 2023, states that no person, other than a certified law enforcement officer, shall be authorized to apprehend, detain, or arrest a bail fugitive unless that person meets one of the following conditions:

- Is a bail as defined in paragraph (2) of subdivision (a) of Section 1299.01 who is also a bail fugitive recovery agent as defined;
- Is a bail fugitive recovery agent as defined; or,
- Is a licensed private investigator who is also a bail fugitive recovery agent as defined. (Pen. Code 1299.02, subd. (a).)

*Existing law* defines a "bail fugitive" as a defendant in a pending criminal case who has been released from custody under a financially secured appearance, cash, or other bond and has had than bond declared forfeited, or a defendant in a pending criminal case who has violated a bond condition whereby apprehension and reincarceration are permitted. (Pen. Code, § 1299.01, subd. (a).)

*Existing law* defines a "bail fugitive recovery person" as a person provided written authorization by the bail or depositor of bail, and is contracted to investigate, surveil, locate, and arrest a bail fugitive for surrender to the appropriate court, jail, or police department, and any person who is employed to assist a bail or depositor of bail to investigate, surveil, locate, and arrest a bail fugitive for surrender to the appropriate court, jail, or police department. (Pen. Code, § 1299.01, subd. (d).)

*This bill* makes it a misdemeanor, punishable by a fine of \$5000 and imprisonment in a county jail not to exceed one year, for a bail fugitive recovery agent to apprehend, detain, or arrest a bail fugitive admitted to bail in another state whose alleged offense or conviction was for the violation of laws of another state that criminalizes an individual performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive

care, or gender-affirming care if the abortion, contraception, reproductive care, or gender-affirming care that is lawful under the laws of this state, regardless of the recipient's location.

*This bill* provides that a person who violates the above provision is ineligible for a bail fugitive recovery agent license and shall forfeit any license already obtained.

*This bill* authorizes a person who is taken into custody by a bail agent in violation of the above provision to institute and prosecute a civil action for injunctive, monetary, or other appropriate relief against the bail fugitive recovery agent within three years after the cause of action accrues.

*This bill* states that notwithstanding any other law and except as required by federal law, an officer or employee of a law enforcement agency of a state or local law enforcement agency, shall not, while acting in their official capacity, provide information or assistance relating to an investigation or inquiry into services constituting legally protected health care activity, including but not limited to, abortion, contraception, reproductive care, and gender-affirming care, if such services would be lawful if they were provided entirely in this state to any of the following:

- A federal law enforcement agency;
- A state law enforcement agency;
- A private citizen; or.
- A bondsman or person authorized as a bail fugitive recovery agent to apprehend, detain, or arrest a fugitive admitted to bail in another state.

*Existing law* establishes the CalWORKs program under which each county provides cash assistance and other benefits to qualified low-income families and individuals. (Welf. & Inst. Code, § 11200 et seq.)

*Existing law* makes certain individuals ineligible for the CalWORKs program including a person who is fleeing to avoid prosecution, or custody and confinement after conviction, under the laws of the place from which the individual is fleeing, for a crime or an attempt to commit a crime that is a felony under the laws of the place from which the individual is fleeing, or which, in the case of the State of New Jersey, is a high misdemeanor under the laws of that state. (Welf. & Inst. Code, § 11486.5, subd. (a).)

*This bill* specifies that for purposes of the above provision on CalWORKs ineligibility, an individual is not considered fleeing to avoid prosecution if the felony offense with which the person is charged or convicted is as a result of performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming care if the abortion, contraception, reproductive care, or gender-affirming care is lawful under the laws of this state, regardless of the recipient's location.

*Existing law* establishes CalFresh whereby recipients of aid and other low-income households to receive benefits under the federal Supplemental Nutrition Assistance Program (SNAP). (Welf. & Inst. Code, § 18900 et seq.)

*This bill* provides that a person who is fleeing to avoid prosecution, or custody and confinement after conviction, whose alleged offense or conviction is for the violation of laws of another state that authorizes a criminal penalty to an individual performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming

care is eligible for CalFresh benefits, if the abortion, contraception, reproductive care, or gender-affirming care is lawful under the laws of this state, regardless of the recipient's location.

*This bill* contains the following Legislative findings and declarations:

- In 2022, following the United States Supreme Court decision overturning *Roe v. Wade*, California's legislature passed and Governor Gavin Newsom signed a package of bills, led by members of the Legislative Women's Caucus, and complimentary budget actions that established the state as a haven for those fleeing prosecution for seeking abortion and gender-affirming care in other states.
- Many states have now passed laws that make seeking or providing an abortion a felony offense.
- Many states have also enacted laws or regulations banning gender-affirming care and 15 additional states are considering legislation to do so.
- It is the intent of the legislature to pass legislation to provide protections and supports to any person fleeing a prosecution, conviction, or sentence in another state for seeking an abortion, contraception, reproductive care, or seeking gender-affirming care and to any person assisting the person seeking that care.

## COMMENTS

### 1. Need for This Bill

According to the author of this bill:

Last year the Legislature, Governor Newsom, and California voters took bold action, guaranteeing the right to an abortion and gender-affirming care. But a growing number of states have done the opposite, putting residents who seek essential health care at risk of being prosecuted. My 'Safe Haven' bill will ensure that those who come to California fleeing persecution by other states will be free from the worry that a bounty hunter could snatch them up and send them back.

### 2. Reproductive Rights in California

*Roe v. Wade*, (1973) 410 U.S. 113 (overruled by *Dobbs v. Jackson Women's Health* (2022) 142 S. Ct. 2228), was the landmark U.S. Supreme Court decision that held that the implied constitutional right to privacy extends to a person's decision whether to terminate a pregnancy. Specifically, the Court found for the first time that the constitutional right to privacy is "broad enough to encompass a woman's decision whether or not to terminate her pregnancy." *Roe* had been one of the most debated Supreme Court decisions, and its application and validity continued to be challenged time and again. For example, in *Planned Parenthood of Southeastern Pennsylvania v. Casey* (1992) 505 U.S. 833, the Court reaffirmed the basic holding of *Roe*, yet also permitted states to impose restrictions on abortion as long as those restrictions do not create an undue burden on a person's right to choose to terminate a pregnancy.

Last year, in *Dobbs v. Jackson Women's Health*, *supra*, the U.S. Supreme Court overturned *Roe v. Wade* holding that, contrary to 50 years of precedent, there is no fundamental constitutional right to have an abortion. (*Dobbs*, 142 S. Ct. at 2242.) The majority opinion further provided that

states should be allowed to decide how to regulate abortion and that a strong presumption of validity should be afforded to those state laws. (*Id.* at 2283-2284.)

In California, before *Roe v. Wade* was decided by the U.S. Supreme Court, the California Supreme Court held in 1969 that the state constitution's express right to privacy extends to an individual's decision about whether or not to have an abortion. (*People v. Belous* (1969) 71 Cal.2d 954.) Existing California statutory law provides, under the Reproductive Privacy Act, that the Legislature finds and declares every individual possesses a fundamental right of privacy with respect to personal reproductive decisions; therefore, it is the public policy of the State of California that every individual has the fundamental right to choose or refuse birth control and the right to choose to bear a child or to choose to obtain an abortion. (Health & Safe. Code § 123462, subds. (a)-(b).) The Act further provides that it is the public policy of the state that the state shall not deny or interfere with a person's fundamental right to choose or obtain an abortion prior to viability of the fetus or when the abortion is necessary to protect the life or health of the pregnant person. (Health & Saf. Code, § 123466.)

In the 2022 general election, California voters approved Proposition 1 to amend the state constitution to guarantee the right to abortion and contraception. This ballot measure was approved by 66.9 percent of voters. (Secretary of State, November 8, 2022 General Election State Ballot Measures by County <<https://elections.cdn.sos.ca.gov/sov/2022-general/sov/props.pdf>> [as of Mar. 6, 2023].)

Last year, several bills were enacted to further protect reproductive rights in California. AB 1242 (Bauer-Kahan), Chapter 627, Statutes of 2022, protects reproductive digital information handled by companies incorporated or headquartered in California and prevents the arrest of individuals or the disclosure by law enforcement of information in an investigation related to any abortion that is legal in California. AB 1666 (Bauer-Kahan), Chapter 42, Statutes of 2022, declares that a law of another state that authorizes a person to bring a civil action against a person or entity that receives or seeks, performs or induces, or aids or abets the performance of an abortion, or who attempts or intends to engage in those actions, is contrary to the public policy of this state. AB 2091 (Bonta), Chapter 628, Statutes of 2022, prohibits a provider of health care, health care service plan, or contractor from releasing medical information related to an individual seeking or obtaining an abortion in response to a subpoena or request if that subpoena or request is based on either another state's laws that interfere with a person's rights set forth in the Reproductive Privacy Act and prohibits the issuance of a subpoena, from the Superior Court or an attorney licensed in California, based on a civil action authorized by the law of a state other than this state in which the sole purpose is to punish an offense against the public justice of that state. AB 2223 (Wicks), Chapter 629, Statutes of 2022 prohibits a person from being criminally or civilly liable for miscarriage, stillbirth, abortion, or perinatal death due to causes that occurred in utero.

This bill builds upon California's existing protections for reproductive rights by prohibiting law enforcement from providing information or assistance to specified entities regarding services constituting legally protected health care activity, including but not limited to, abortion, contraception, reproductive care, and gender-affirming care, if those services would be lawful if they were provided within this state. This bill also prohibits the issuance of an arrest warrant for an individual admitted to bail in another state and escapes bail if the alleged offense or conviction is for the violation of another state's law that criminalizes an individual performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming care if such care is lawful in California. The bill also prohibits a bail bondsman or bounty hunter from arresting and taking into custody a bail fugitive

whose violation or conviction is for one of these acts. A violation of this prohibition would be punishable as a misdemeanor and the person violating the law would not be eligible for a license to operate in California. Additionally, the individual who is taken into custody in violation of this law would be able to pursue a civil action against the bail bondsman or bounty hunter.

This bill would also remove potential barriers to receive public benefits under CalWORKs and CalFresh based on the individual fleeing prosecution or confinement after conviction for an offense related to performing, receiving, supporting, or aiding in the performance or receipt of an abortion, contraception, reproductive care, or gender-affirming care if that care is lawful under California's laws.

### **3. Gender-Affirming Health Care Protections in California**

Last year, in response to a series of laws and executive orders adopted in other states that impose civil and/or criminal liability on transgender youth, their parents and medical providers who assist them in obtaining gender-affirming care, California enacted protections for such individuals obtaining care in this state. The new law, among other things, prohibits the sharing of medical records regarding the receipt of gender-affirming care; the enforcement of out-of-state subpoenas seeking information regarding the receipt of gender-affirming medical care in California; and the enforcement of laws of another state that authorize the removal of a child from their parent or guardian and enforcement of out-of-state criminal laws related to gender-affirming health care. (SB 107 (Wiener), Chapter 810, Statutes of 2022.)

This bill provides additional protections for individuals receiving gender-affirming health care in California by prohibiting a judge from issuing a warrant to arrest a bail fugitive whose offense is based on another state's laws that criminalize gender-affirming health care and prohibiting a bail fugitive recovery person and bail bondsman from taking such individuals into custody. This bill also prohibits local law enforcement agencies from sharing information about such individuals with specified entities, including federal law enforcement and bail bondsmen.

### **4. Bail Fugitive Recovery Persons**

Bail fugitive recovery persons, also known as bounty hunters, are persons who are hired to locate and apprehend bail fugitives for surrender to the appropriate court, jail, or police department. Existing law places specified requirements on bail fugitive recovery agents, including that the person must be at least 18 years of age, complete 20 hours of classroom education pertinent to the duties and responsibilities of a bail licensee, complete a 40-hour power of arrest course certified by the Commission on Peace Officer Standards and Training, and not have been convicted of a felony, except as specified. Bail fugitive recovery persons are also required to carry certificates of completion of the mandatory training programs with them at all times in the course of performing their duties.

Starting July 1, 2023, bail fugitive recovery persons must obtain a license through the Department of Insurance in order to operate in California and will be required to maintain a policy of liability insurance that provides minimum limits of insurance of \$1,000,000 for any one loss or occurrence due to either bodily injury or death, or property damage, or both.

This bill would prohibit a bail fugitive recovery person from apprehending, detaining, or arresting a bail fugitive who has been admitted to bail in another state and whose alleged offense or conviction is for the violation of a law of another state that authorizes a criminal penalty to an

individual performing, receiving, supporting, or aiding in the performance or receipt of abortion, contraception, reproductive care, or gender-affirming care, if the abortion, contraception, reproductive care, or gender-affirming care is lawful under the laws of this state, regardless of the recipient's location. The bill would make a violation of this provision a misdemeanor and make the individual ineligible for and subject to forfeiture of a license received through Department of Insurance. Furthermore, an individual taken into custody in violation of these provisions would be able to pursue a civil action against the bail fugitive recovery agent within three years after the cause of action accrues.

## 5. CalWORKs and CalFresh

CalWORKs is a public assistance program that offers temporary cash aid assistance, nutrition benefits, employment services and health insurance to eligible families who have children under the age of 18. The program is operated locally by county welfare departments. If a person is eligible for CalWORKs, they are eligible for Medi-Cal and may also qualify for CalFresh food benefits. The amount of a family's monthly assistance payment depends on a number of factors, including the number of people who are eligible and the special needs of any of those family members. The income of the family is considered in calculating the amount of cash aid the family receives.

CalFresh provides monthly food benefits for individuals and families with low-income. According to the CalFresh Program website:

CalFresh benefits can help buy nutritious foods for a better diet. CalFresh benefits stretch food budgets, allowing individuals and families to afford nutritious food, including more fruit, vegetables and other healthy foods. The amount of benefits a household receives is dependent on household size countable income, and monthly expenses, such as housing and utilities. The program issues monthly benefits on an Electronic Benefit Transfer (EBT) card. Food may be purchased at any grocery store or farmers market that accepts EBT cards.

(See CalFresh Program, California Department of Social Services Programs <<https://www.cdss.ca.gov/inforesources/calfresh>> [as of Mar. 6, 2023].)

Existing law makes ineligible for CalWORKs benefits an individual who is fleeing another state to avoid prosecution, or custody and confinement after conviction, for a crime that is a felony under the laws of that state. (Welf. & Inst. Code, §11486.5.)

This bill states that for purposes of this exclusion, an individual is not considered feeling to avoid prosecution if the felony offense is the result of performing or receiving an abortion, contraception, reproductive care, or gender-affirming care if the care is lawful under the laws of California, regardless of the recipient's location. This bill also specifies that the person is eligible for CalFresh benefits, regardless of the recipient's location.

The addition of the words, "...regardless of the recipient's location" would seem to mean that a person may receive these benefits regardless of where they currently reside, i.e. a location outside of California. The author has indicated that this is not the intent of this provision, thus, this language should either be clarified or deleted.



## 6. Full Faith and Credit Clause

Generally, the laws of the state regulate conduct that occurs within that state. However, situations may arise where more than one state's laws may apply such as collection of previously-owed income taxes or child support obligations from another state. Or one state has jurisdiction to criminally prosecute an offense because someone has fled the state or committed part of the crime in the prosecuting state. Under the United States Constitution, states are required to provide full faith and credit to "to the public acts, records, and judicial proceedings of every other state. (U.S. Const. art. IV, sec. 1.)"

The Full Faith and Credit Clause may be implicated when there is a conflict between the laws of the different states. At least one court has held that any effort by a state to apply its criminal laws beyond its state borders to criminalize activity that is otherwise lawful in the other state. (*Bigelow v. Virginia* (1975) 421 U.S. 809.) However, the Supreme Court has also held that even when criminal conduct takes place outside of the state, extraterritorial jurisdiction may be proper when the conduct was intended to produce or did produce harmful effects within the state. (*Strassheim v. Daily* (1911) 221 U.S. 280.)

The Supreme Court has also made a distinction between the strength of the Full Faith and Credit Clause's applications to judgments versus state law. "The Full Faith and Credit Clause does not compel 'a state to substitute the statutes of other states for its own statutes dealing with a subject matter concerning which it is competent to legislate. Regarding judgments, however, the full faith and credit obligation is exacting. A final judgment in one State, if rendered by a court with adjudicatory authority over the subject matter and persons governed by the judgment, qualifies for recognition throughout the land.'" (*Baker v. General Motors Co.*, *supra*, 522 U.S. at 232-233.) This concept is often referred to as the "public policy exception" meaning statutes in one state is given effect only if they do not contravene the public policy of the other state.

By refusing to recognize the laws of another state, this bill appears to implicate the Full Faith and Credit Clause. California has declared that such laws that criminalize abortion, contraceptives and gender-affirming health care are against the public policy of this state and shall not be enforced in a court in this state. Thus, a challenge based on a violation of the Full Faith and Credit Clause would likely be met with a response that the public policy exception applies. Whether such exception applies is ultimately up to the courts.

## 7. Argument in Support

According to Equality California, a co-sponsor of this bill:

Following the U.S. Supreme Court decision in *Dobbs v. Jackson*, the Legislature passed and the Governor signed a package of bills making California a sanctuary state for abortion services and gender-affirming care. In addition, in the November election, California voters enacted a constitutional amendment guaranteeing the right to abortion and contraception. Meanwhile, a growing number of states have been passing laws putting residents who seek essential gender-affirming care and reproductive health care services at risk of being prosecuted. States are attempting to classify the provision of gender-affirming health care as a crime warranting prison time and are threatening parents with criminal penalties if they attempt to travel to another state in order to secure life-saving gender-affirming care for their child. While attacks on the transgender

community are not new, we are experiencing alarmingly blatant attempts to use legislation, policy, and political rhetoric to restrict or eliminate the autonomy, freedom, and existence of transgender people across the country.

SB 36 builds on California landmark protections further protecting people who have been charged or convicted in another state as a result of the criminalization of abortion or gender-affirming health care that is fully legal in California.

## 8. Argument in Opposition

According to the Right to Life League:

The U.S. Constitution is the supreme law of our land. Thanks to the recent U.S. Supreme Court decision in *Dobbs*, states regulate abortion. *Dobbs* did not change the applicability of the Full Faith and Credit Clause in Article 4. California may proclaim itself an “Abortion Sanctuary”; however, California may not thwart the laws of other states to suit its radical pro-abortion agenda.

....

On its face, the bill’s subsections (b), (c) and (d) impermissibly violate the U.S. Constitution. Subsection (b) unlawfully forbids magistrates from complying with valid court orders issued in foreign states. Subsection (c) strips state licensing of bail agents and bondsmen complying with valid court orders issued in foreign states. Subsection (d) creates a private cause of action designed to chill the enforcement of foreign states’ laws. Like other unconstitutional laws AB 1666 and AB 2091, SB 36 usurps valid judicial power to unlawfully ignore other states’ laws. SB 36 blatantly violates the Full Faith and Credit Clause in Article 4 of the U.S. Constitution by instructing those tasked with enforcing foreign state law not to comply. SB 36 will thwart enforcement of foreign laws against abusers and human traffickers who flee to California to escape prosecution in other states, denying justice to their victims.

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