No. 19-123

IN THE

Supreme Court of the United States

SHARONELL FULTON, ET AL.,

Petitioners,

v.

CITY OF PHILADELPHIA, PENNSYLVANIA, ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Third Circuit

BRIEF OF *AMICI CURIAE* INDIAN LAW PROFESSORS IN SUPPORT OF RESPONDENTS

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INTEREST OF *AMICI CURIAE*[1]

Amici are law professors whose scholarship and clinical practice focus on the subject matter areas of Indian law, tribal powers, and federal- and state-court jurisdiction.[2] These areas of focus are directly implicated by any discussion of the enforceability of nondiscrimination standards applicable to the public child welfare system. *Amici* have an interest in ensuring that cases concerning these issues are decided consistently with foundational principles in this area of law, and the express intent of Congress in protecting Indian families from continued discrimination through the Indian Child Welfare Act. *Amici* submit this brief to provide the Court important background regarding the history of discrimination against Indian children and families, which shows the necessity of nondiscrimination norms in this area.

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[1] Counsel for all parties have consented to the filing of this brief. Pursuant to Supreme Court Rule 37.6, *amici* affirm that no counsel for a party authored this brief in whole or in part, and that no person or entity other than *amicus*, its members, and its counsel made a monetary contribution intended to fund the preparation or submission of this brief.

[2] A complete list of *amici* appears in an appendix to this brief.

INTRODUCTION AND SUMMARY OF ARGUMENT

Amici write to explain how the long and shameful history of treatment of Indian children by the child welfare system in the United States demonstrates the dangers of and substantial harms inflicted by discrimination in this setting, including in particular discrimination based on the religious beliefs of government employees or agents.

For over a century prior to the late 1970s, state child welfare agencies, working hand in hand with white religious institutions, forcibly removed Indian children from their families, homes and cultures, and placed them with white, Christian foster or adoptive homes. Historians estimate that that as many as 25% to 30% of all Indian children nationwide were involuntarily taken from their communities and placed with white families, based in part on the conviction that a "Christian" upbringing would be better for the children than other environments. State and religious agencies targeted Indian children for removal based on specious assumptions about the fitness of Indian families, and relied on those same biased assumptions to exclude from consideration Indian homes willing to serve as foster or adoptive families, including the children's own extended family members.

The devastating impact of these discriminatory child welfare policies on Indian children, Indian families, and Indian tribes, and the stain they have left on the entire child welfare system in the United States has been documented by historians and recognized by Congress. Only legislative action, enactment of the Indian Child Welfare Act of 1978, put an end to and sought to remedy that disgraceful

episode of American history in which cultural and religious prejudice prevailed and preferential treatment of certain state-sanctioned cultures and religions over others was permitted to dictate child welfare decisions. *Amici* respectfully submit that the lessons learned from this tragic experience should inform the Court's consideration of Petitioners' argument that they should be permitted, as agents of the state, to opt out of local anti-discrimination policies and exclude prospective foster families who do not meet their religious standards.

ARGUMENT

I. THE HISTORY OF DISCRIMINATION, INCLUDING RELIGIOUS DISCRIMINATION, IN THE REMOVAL AND PLACEMENT OF INDIAN CHILDREN DEMONSTRATES THE NEED FOR NON-DISCRIMINATION RULES TO PROTECT CHILDREN AND FAMILIES.

From this nation's earliest days, government and religious institutions, often working in tandem, targeted Indian children for assimilation into white Christian culture. State and church worked together to place Indian children, against the will of the children and their parents, in military and religious schools. Later, and throughout the century preceding the late 1970's, states forcibly removed Indian children from their families and placed them with white Christian families through private and publicly arranged adoptions and foster care arrangements. The system was blatant, state-sponsored discrimination: Indian families—both immediate families, and those extended family members willing to serve as placements—were considered unfit by default to raise children.

The harms inflicted by this state-sanctioned discrimination have been well documented by historians and fully recognized by the United States Congress, leading to its passage of the Indian Child Welfare Act ("ICWA"), 25 U.S.C. §§ 1901-1963, in 1978. Considered the "gold standard" in child welfare policy, the law seeks to remedy more than a century of disparate treatment of Indian children and families, and to prevent further discriminatory removal of Indian children from their homes. Indian Country's painful history, and Congress's effort to halt and reverse the injury through corrective legislation, make clear that nondiscrimination norms are essential in connection with child welfare, adoption, and foster care. Petitioners' effort to establish a constitutional right to discriminate based on religious beliefs ignores this tragic history and the lessons the United States already has learned from it.

A. Early Federal Policies Targeted Indian Families for Assimilation and Religious Conversion through Education.

Policies targeting Indian children for assimilation and religious conversion originated as coercive efforts in colonial America and the fledgling United States. See Matthew L.M. Fletcher & Wenona T. Singel, *Indian Children and the Federal-Tribal Trust Relationship* 95 Neb. L. Rev. 885, 911-912 (2017) (tracing the history of colonial mandates of religious conversion through post-war treaty proposals to place missionaries among Indian tribes and to include education provisions in Indian treaties). As the new United States government gained footing, tribes "legally devolved from . . . semi-independent sovereigns to a governmental wardship status." Raymond Cross, *American Indian Education: The*

Terror of History and the Nation's Debt to the Indian Peoples, 21 U. Ark. Little Rock L. Rev. 941, 952 (1999). Federal policy toward Indian tribes as federal wards sought to "break up the extended family," "to detribalize and assimilate Indian populations," to ban Indian religions, to punish children "for speaking their mother tongue," and generally "to reform Indian family and community life." *Indian Child Welfare Program: Hearings before the Subcomm. on Indian Affairs of the S. Comm. on Interior and Insular Affairs*, 93rd Cong. 25 (1974) (statement of William Byler, Executive Director, Association on American Indian Affairs) (hereafter "1974 Hearings"). By the 1880s, the compulsory education of Indian children and their mandatory conversion to Christianity became the primary means of accomplishing these objectives. See Fletcher & Singel, *Indian Children and the Federal-Tribal Trust Relationship*, 95 Neb. L. Rev. at 940.

Ultimately, "[r]eservation Indian life was deemed so inherently destructive of the Indian children so as to mandate their physical removal from its debilitating influences." Cross, *American Indian Education*, 21 U. Ark. Little Rock L. Rev. at 944. "One federal official suggested 'tak[ing Indian children] in their infancy and plac[ing] them in its fostering schools; surrounding them with an atmosphere of civilization, maturing them in all that is good, and developing them into men and women instead of allowing them to grow up as barbarians and savages.'" Fletcher & Singel, *Indian Children and the Federal-Tribal Trust Relationship*, 95 Neb. L. Rev. at 942 (citation omitted).

These notions of "protecting" Indian children from their own culture led to the creation of Indian boarding schools to facilitate removal of Indian children from

their homes and families. S. Rep. No. 95-597, at 39 (1977) (excerpt from American Indian Policy Review Commission, *Final Report* (May 1977)). The federal government and church officials, often working together, first coerced, and later forced, native families to send their children to these schools, many of which were funded by the federal government and "managed by various Christian denominations." Mary Annette Pember, *Death by Civilization*, The Atlantic (March 8, 2019); Cross, *American Indian Education*, 21 U. Ark. Little Rock L. Rev. at 957 (the federal government "sought to delegate [the] responsibility [for running Indian schools] to religious denominations"); see, e.g., Treaty between the United States of America and the Chippewa Indians of Saginaw, Swan Creek, and Black River, Michigan, *proclaimed* Aug. 16, 1866, 14 Stat. 657 (providing funding for the establishment of an Indian school, and granting control of said school to the Missionary Society of the Methodist Episcopal Church). Clergy acting as teachers and administrators at Indian boarding schools prohibited Indian children "from speaking their native language," and from observing "Indian religions, or other aspects of the culture that they might practice." 1974 Hearings at 131 (comment of Sen. Abourezk). Indian children at boarding schools were required to attend Christian church services at least until the mid-1970s. See 1974 Hearings at 133 (testimony of Drs. Bergman and Goldstein) (children at modern Indian boarding schools are required to attend Christian church services, regardless of their religious beliefs).

The removal of Indian children to boarding school resulted directly in the placement of those children in non-Indian, Christian families. Fletcher & Singel, *Indian Children and the Federal-Tribal Trust Relationship*, 95 Neb. L. Rev. at 943. By the practice

referred to as "outing," Indian boarding schools began detailing students "to serve as manual workers on farms and in households." *Id*. Captain Richard H. Pratt, head of the Carlisle Indian School and author of *The Advantages of Mingling Indians with Whites* (1892), believed that "the system should be extended until every Indian child was in a white home[.]" *Id*.

Compulsory education polices ultimately removed entire generations of Indian children from their families and communities and forced them into white, Christian homes. But the government's stated goals were never achieved. The mandatory attendance at boarding school and subsequent insertion of Indian children into these households failed to assimilate, or even to educate, most of the children targeted. Cross, *American Indian Education*, 21 U. Ark. Little Rock L. Rev. at 957-960. The practice instead caused a variety of snowballing and dire consequences for Indian families as it "removed children at a crucial time in their upbringing," when those children otherwise would have learned "their cultures and languages" and "the proper way to raise children within extended family networks." Margaret D. Jacobs, *A Generation Removed: The Fostering and Adoption of Indigenous Children in the Postwar World* at 13 (2014). Only after government administrators began to conclude that boarding schools were too expensive—and sought to blame Indian families instead of their own mandatory policies for the high numbers of Indian children in those schools—did federal support necessary to sustain the program gradually dwindle.[3] Jacobs, *A Generation Removed* at 12.

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[3] Both government and private Indian boarding schools remain in operation today, many of them Christian religious-based

B. The Child Welfare System Allowed State and Religious Entities to Continue to Impose Discriminatory Standards on Indian Families.

The practices of removing Indian children from their homes and putting them in boarding schools also had a self-reinforcing quality. Indian communities and families that saw their children forcibly removed and suffered the consequent social and economic disruption were then characterized by state and private agencies as unfit to raise children. Jacobs, *A Generation Removed* at 19-20; 1974 Hearings at 25 (Byler prepared statement) (discussing economic, educational, health, and housing disparities among Indian families as consequences of long-established federal policy, and noting that not all similarly situated groups suffer from similarly high rates of family separation). The discriminatory treatment of Indian children and families was also exacerbated by financial concerns especially after 1950. Indian children in special need of care as a consequence of the failed boarding school experiment were forced into adoptive homes as a means of privatizing the cost of raising them. Jacobs, *A Generation Removed* at 17, 19.

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institutions. See The National Native American Boarding School Healing Coalition, *American Indian Boarding Schools by State*, https://boardingschoolhealing.org/education/resources/ (73 Indian schools remain open today, 15 continue boarding students). Troublingly, vestiges of the historical association between boarding schools and adoption of Indian children persist in the minds of many — one such school has had to explicitly state on its website in response to Frequently Asked Questions that it does not make its students available for adoption. See, e.g., St. Labre Indian School, *Frequently Asked Questions*, https://www.stlabre.org/ways-to-give-copy/faq/ ("Are the youth in this facility available for adoption by non-Native families?").

Concurrent federal policy incentivized relocation of Indians to urban areas, and accordingly shifted responsibility for many Indian children to states. *Id*. at 8-9, 15. States resisted this charge and the monetary burdens it imposed. *Id*. at 15. They came to regard "the adoption of Indian children in state care as the ultimate solution to their budgetary concerns." *Id*. at 17. States' endorsement of this perceived solution cannot be overstated: state governments removed between 25% and 30% of all Indian children nationwide from their families, placing about 90% of those children in white foster or adoptive homes. Fletcher & Singel, *Indian Children and the Federal-Tribal Trust Relationship*, 95 Neb. L. Rev. at 955; 1974 Hearings at 4 (Byler statement). To the extent religious agencies made placements, Indian children were placed entirely with members of that religion. See Jacobs, *A Generation Removed* at 87 (the Church of Jesus Christ of Latter Day Saints placed up to 50,000 Indian children with Mormon families).

As Congress later observed, state and private agencies targeted Indian children for removal based on discriminatory criteria echoing the assimilative justifications of the boarding school era. Rarely were Indian children removed for physical abuse, 1974 Hearings at 4 (Byler statement); rather Indian families were often separated based on "temporary or remedial" conditions, S. Rep. No. 95-597, at 11. Review of the criteria and policies used to justify removal reveals that many of these conditions were in fact pretextual; Indian families continued to be targeted by the child welfare system, as they were by compulsory education policies, simply because they were Indian. For example, California social workers placed an Indian child in a pre-adoptive home without any evidence that the child's mother was unfit, based only

on the social workers' "belief that an Indian reservation is an unsuitable environment for a child." 1974 Hearings at 19-20 (Byler prepared statement). Similarly, "[a] survey of a North Dakota tribe indicated that, of all the children that were removed from that tribe, only 1 percent were removed for physical abuse." 1974 Hearings at 4 (Byler statement). Removal of the other 99 percent was justified "on the basis of such vague standards as deprivation, neglect, taken because their homes were thought to be too poverty stricken to support the children." *Id*.

Likewise, paternalistic judgments about family structure and the validity of traditional Indian practices led adoption proponents to target the children of unwed Indian mothers. The Bureau of Indian Affairs and state social workers sought to convince unwed Indian mothers to give up their children for adoption even where there was no need because illegitimacy bore no stigma within the Indian community and the mother or her family were fully prepared to accept and care for the child. Jacobs, *A Generation Removed* at 24-25. Those targeted by the government included mothers wed by traditional custom rather than under state laws. *Id*. at 24.

As in the boarding school era, these discriminatory policies resulted in the removal of thousands of children from their homes to non-Indian foster homes and adoption placements. 25 U.S.C. § 1901(4) (Congressional findings). Through these practices, Indian children became greatly overrepresented in the child welfare system compared to non-Indian children.[4] Furthermore, because a financial incentive

[4] "In Minnesota, Indian children are placed in foster or in adoptive homes at [a] rate of five times . . . greater than non-

existed for foster care, but such payments ceased after adoption, some Indian children cycled through multiple foster homes but were not adopted. 1974 Hearings at 24 (Byler prepared statement) (describing how federally-subsidized foster care programs may encourage some non-Indian families to supplement their meager farm income with foster care payments and to obtain extra hands for farm work, noting that such payments cease after adoption, and highlighting a disparity between the number of Indian children in foster care versus the number of Indian children in adoptive homes); 1974 Hearings at 45 (statement of Dr. Joseph Westermeyer, Department of Psychiatry, University of Minnesota) (describing Indian patients who had been placed out of their birth homes: "the majority of these in foster homes . . . and a minority of them, only a few, in adoptive homes. . . . foster home placement was never, in all of these instances, restricted to one home").

Indian families were also discriminated against by virtue of the removal and placement of Indian children without due process. 1974 Hearings at 5 (Byler statement). "Few Indian parents, few Indian children [were] represented by counsel in custody cases. Removal of these children [was] so often the most

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Indian children. In South Dakota, 40 percent of all adoptions made by the State's department of public welfare since 1968 are of Indian children, yet Indian children make up only 7 percent of the total population. The number of South Dakota Indian children living in foster homes is per capita nearly [16 times] greater than the rate of non-Indians. In the State of Washington, the Indian adoption rate is 19 times . . . greater and the foster care rate is [10 times] greater than it is for non-Indian children. In Wisconsin, the risk of Indian children being separated from their parents is nearly [16 times] greater than it is for non-Indian children." 1974 Hearings at 3 (Byler statement).

casual kind of operation, with the Indian parents often not having any idea of what kind of legal recourse or administrative recourse is available to them." *Id*. Non-Indian "adoptive parents" also took children with "no pretense of adoption, no color of law." Laura Briggs, *Taking Children: A History of American Terror* at 70 (2020) (citation omitted). One child "was taken by two Wisconsin women with the collusion of a local missionary after her Oglala Sioux mother was tricked into signing a form purportedly granting them permission to take the child on a short visit but, in fact, agreeing to her adoption." 1974 Hearings at 22 (Byler prepared statement) (describing the case as "simple abduction[]"). As the child's mother sought her return, these "adoptive parents" cited the importance of a religious (i.e., Christian) upbringing in support of their claim to retain the Indian child against the family's will. Briggs, *Taking Children* at 70 ("We have not taken Benita from you; you gave her physical birth, which we could not give, and we can give her opportunities which you could not give—so she belongs to both of us. But far more, she belongs to the Lord.").

The same discriminatory standards used to justify removal of Indian children from their homes "also applied against Indian families in their attempts to obtain Indian foster or adoptive children." 1974 Hearings at 5 (Byler statement). Standards used to justify placement in non-Indian homes were "based upon middle-class values; the amount of floor space available in the home, plumbing, income levels. Most of the Indian families [could not] meet these standards and the only people that [could] meet them [were] non-Indians." *Id*. State courts making placement decisions often failed to consider any information about extended family and community members available to

support or care for the child. 1974 Hearings at 63 (prepared statement of Drs. Carl Mindell and Alan Gurwitt, Child Psychiatrists). In at least one instance, social workers physically attempted to remove an Indian child from an Indian family that sought to care for the child after his mother's death. 1974 Hearings at 51-53 (testimony of Mrs. Alex Fournier). Although the state delayed removal, without explanation, for more than a year, social workers made no attempt at any point to determine the fitness of the home—neither to determine whether the home was a suitable placement, nor to assess whether removal was appropriate. *Id*. at 53.

Not only were extended family placements for individual Indian children excluded as a natural consequence of the imposition of discriminatory norms, but state standards for foster care licensure reflected similar exclusion. *Id*. at 63 (prepared statement of Drs. Mindell and Gurwitt) ("The standards used in making the placement reflect the majority culture's criteria for suitable placement . . . and do not take into sufficient account what may be modal within the child's socio-cultural milieu. Thus Indian families are discriminated against as potential foster families."). Only two Indian foster homes existed in Minnesota in the late 1960s and early 1970s. 1974 Hearings at 46 (Westermeyer testimony); 1974 Hearings at 50 (Westermeyer testimony) (noting economic and housing criteria "that operates against adoption by Indian parents, and for adoption by white parents"); 1974 Hearings at 33 (Legislative Recommendations of the Association on American Indian Affairs) (finding that "relatively few Indian homes are licensed by the states to accept foster-care placements"). Despite the lack of licensed homes, other evidence demonstrates that Indian families were

willing and able to serve as placements. 1974 Hearings at 31 (Byler prepared statement) (multiple tribes, when made aware of and given access to some means to combat the problem, were able to end off-reservation foster and adoptive placements almost entirely).

Contributing to the exclusion of Indian families from consideration as placements, religious groups created entire adoption and "education" programs of their own specifically to facilitate fostering and adoption of Indian children by member families. Jacobs, *A Generation Removed* at 49. Lutheran Social Services of South Dakota established a program for the adoption of Indian children in 1965; over the ensuing eleven years the program "placed 305 Indian children in 240 white families." *Id*. The Church of Jesus Christ of Latter Day Saints "placed up to fifty thousand American Indian children with Mormon foster families for nine months of each year. . . from 1947 to 2000." *Id*. at 87. Although the program ostensibly served "educational purposes," it also limited contact between Indian children and their families, actively discouraging family visits, and prohibiting children from returning home or otherwise leaving their foster families "for more than a few hours and definitely not overnight." *Id*. The program also led to the unauthorized removal of Navajo children. *Id*. at 87, 120.

III. DESPITE CONGRESSIONAL INTERNVENTION, INDIAN FAMILIES STILL FACE CHALLENGES IN THE PUBLIC CHILD WELFARE SYSTEM, AND RELIGIOUS EXEMPTIONS TO NONDISCRIMINATION NORMS WOULD JEOPARDIZE WHAT PROGRESS HAS BEEN MADE IN THIS AREA.

Ultimately, as Congress noted, "an alarmingly high percentage of Indian families [we]re broken up by the removal, often unwarranted, of their children from them by nontribal public and private agencies and an alarmingly high percentage of such children [we]re placed in non-Indian foster and adoptive homes and institutions." See 25 U.S.C. § 1901(4) (Congressional findings). These "efforts to make Indian children white . . . destroy[ed] them. [Attempts] to remove Indian children from communities of poverty . . . help[ed] to create the very conditions of poverty. [Removal of] children from the home or disrupt[ion] of family life . . . impede[d] the ability of the child to grow, to learn, for himself, or herself, to become a good and responsible parent later." 1974 Hearings at 6-7 (Byler statement). These harmful consequences of the nation's discriminatory child welfare policies, often based on religious preference for the white, Christian upbringing of all children, spurred Congress to enact the Indian Child Welfare Act in 1978. See 25 U.S.C. § 1901(4) (Congressional findings). Those groups most involved with the removal of Indian children to non-Indian homes, including religious groups, actively opposed the legislation. Jacobs, *A Generation Removed* at 149.

ICWA is, at its core, remedial legislation ensuring that Indian children are not deprived of their cultural

and familial ties based on a discriminatory assessment of subjective family values. See Barbara Ann Atwood, *Children, Tribes, and States*, 155 (2010). The legislation protects both Indian children and parental rights, but also Indian foster families and extended family placements, mandating that all[5] agencies do diligent searches to ensure Indian children in foster care are placed first with their own extended family if at all possible. 25 U.S.C. § 1915(b). Where that is not an option, the state may place an Indian child with a foster family licensed or approved by the child's tribe. *Id*. If neither option is available, the child may be placed with an Indian family licensed by a non-Indian agency, such as a state agency. *Id*. And, just as importantly, states must recruit foster families to ensure they are able to meet the statute's placement preferences.

Compliance with the statute remains an uphill battle, and Indian children continue today to be targeted for removal from their families and Indian community. Indian children remain overrepresented in foster care at rates vastly disproportionate to non-Indian children in many states. See National Council of Juvenile & Family Court Judges, *Disproportionality Rates for Children of Color in Foster Care* (Fiscal Year 2015) 5-6 (Sept. 2017), https://www.ncjfcj.org/sites/default/files/NCJFCJ-Disproportionality-TAB-2015_0.pdf. Despite Congress's recognition that the breakup of Indian families contributed to lasting social problems among Indian people, and that the public child welfare system had failed to recognize "the

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[5] *All* agencies must ensure they follow the placement preferences set forth in 25 U.S.C. § 1915. This responsibility may not be shirked by some agencies and delegated to others. *Contra* Pet'r's Br. 8, 28.

cultural and social standards prevailing in Indian communities and families," the fitness of Indian homes continues to be questioned based on conditions that are the consequence of state-sanctioned discrimination. 25 U.S.C. § 1901(5); see, e.g., Jan Hoffman, *Who Can Adopt a Native American Child? A Texas Couple vs. 573 Tribes*, New York Times (June 5, 2019) (describing testimony in a matter involving the placement of a Navajo child with a non-Indian family over the objection of the child's relatives: "He had a few concerns. He was thinking of the baby 'not as an infant living in a room with a great-aunt but maybe as an adolescent in smaller, confined homes,' he said. 'I don't know what that looks like — if she needs space, if she needs privacy. I'm a little bit concerned with the limited financial resources possibly to care for this child, should an emergency come up.'").

Although a long road remains in front of Indian children and families seeking to escape the legacy of family separation and ensure their fair treatment, the remedial non-discrimination protections afforded by ICWA have been critical in moving the public child welfare system toward that goal. Accepting Petitioners' argument and establishing a constitutional right on the part of government-contracted child welfare providers to opt out of non-discrimination requirements based on religious objections threatens to undermine hard-won progress in this area.

CONCLUSION

The history of forced placement of Indian children in white, Christian households based on cultural and religious beliefs illustrates the critical need for nondiscrimination protections in the child welfare system and the risk of harm to both children and potential foster and adoptive families in allowing religious exemptions to those protections. Paternalistic, cultural and religious-based predeterminations of fitness based on criteria unrelated to the needs of the child were, and continue to be, weaponized against Indian families to justify the removal of Indian children, or the selection of non-Indian homes for placement. As discussed above, Indian families suffered the wholesale removal of their children at the hands of state and religious institutions seeking to assimilate, "civilize," and convert Indian people. That discrimination has resulted in substantial harm that Indian families continue to suffer from today, including the loss of connection to their own languages and cultures, difficulty in developing essential parenting skills, and lasting multi-generational poverty. Congress intended ICWA to be a comprehensive solution to the problems facing Indian children and families in the child welfare system, and the statute has helped remedy the situation even as the harms caused by a century of discrimination have proved intractable.

This shameful history must inform any decision about whether to permit a child welfare system to engage in religious discrimination, much less to prohibit the system from outlawing such discrimination. Toleration of policies that deem some families less worthy than others–whether based on culture, religion, or sex-

ual orientation–injures everyone involved: the children in need of care; foster and adoptive families standing ready to open their home to nurture a child in need of placement; and society as a whole, which is sent a loud and clear message that the disfavored foster family is of less value in the eyes of the government.

Respectfully submitted,

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APPENDIX

APPENDIX—LIST OF *AMICI*

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