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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

WILLIAM ALBERTO AROCHA, JR.,

Petitioner,

vs.

CECILIA BLACKMAN and
BLACKFEET TRIBE,

Respondents.

**Case Nos. CR 17-58-GF-BMM
CV 22-115-GF-BMM**

**AMENDED PETITION FOR
HABEAS CORPUS BY INDIAN
PERSON IN TRIBAL CUSTODY**

**PETITIONER WILLIAM ALBERTO AROCHA JR.'S
AMENDED PETITION**

SUBMITTED: May 2, 2023

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**AMENDED PETITION FOR
HABEAS CORPUS BY INDIAN
PERSON IN TRIBAL CUSTODY**

The Petitioner, William Arocha, Jr., through Counsel David F. Ness and the Federal Defenders of Montana, respectfully submits this Amended Petition for Habeas Corpus by an Indian person in tribal custody pursuant to 25 U.S.C. § 1303 and 28 U.S.C. § 2241(c)(3).

I. Recitals

1. The Petitioner, William Arocha Jr., was convicted *in absentia* following a jury trial in the Blackfeet Tribal Court of assault in violation of Chapter 5, Part II, Section 1(C) and criminal endangerment in violation of Chapter 5, Part II, Section 4 of the Blackfeet Law & Order Code. Under tribal law, assault under Section (1)(C) carries a maximum sentence of one year imprisonment and a fine of \$5,000. Criminal endangerment carries a maximum potential penalty of nine months imprisonment and a \$3,000 fine.

2. Arocha's trial took place on October 24, 2017. Although he did not attend his trial, Arocha was represented by Thane Johnson, an attorney from Kalispell, Montana. (Attachment 1 at 1-2).

3. A sentencing hearing was held on November 8, 2017. Neither Arocha nor his counsel, Thane Johnson, attended the hearing. At the conclusion of the hearing, the presiding Judge, Carl Pepion, imposed the maximum sentence allowed on the assault charge – one year in jail and a \$5,000 fine. With respect to the criminal endangerment charge, Arocha was sentenced to a term of nine months incarceration and a \$1,000 fine. These sentences were ordered to run consecutive to one another for a total term of imprisonment of 21 months. Arocha was also ordered to pay restitution in the amount of \$775,000. On February 2, 2018, Judge Pepion filed a written order memorializing his sentence. (Attachment 1 at 2, 5-6).

4. Arocha did not file a direct appeal of his convictions or sentences to the Blackfeet Appellate Court.

5. Shortly after he was charged in tribal court, the Government filed an Indictment charging Arocha with second degree murder in violation of 18 U.S.C. §§ 1111 and 1153(a). (doc. 15).¹ On May 9, 2018, after a two day trial, Arocha was convicted of the lesser included offense of voluntary manslaughter. (doc. 76). The following August, this Court sentenced him to serve 56 months in prison followed by two years of supervised release. He was also required to pay \$4,271 in restitution. (doc. 109). Arocha was released from his federal sentence on August 31, 2022.

6. Upon his release, Arocha was taken into custody by the Pine County Sheriff's Department in Pine County, Minnesota, and held for transportation to Browning, Montana, for service of his tribal sentence.

7. On September 14, 2022, Arocha's attorney, Thane Johnson, filed a petition for habeas corpus in the Blackfeet Appellate Court. His petition was denied less than a week later, on September 20, 2022. (Attachments 6, 8).

¹ See, *United States v. Arocha*, No. 17-CR-58-GF-BMM

8. On September 27, 2022, Mr. Johnson filed a Motion for a New Trial or, in the Alternative, for Relief from Judgment. This motion was denied by the trial court on October 6, 2022. (Attachments 9, 11).

9. Arocha is currently in the custody of the Blackfeet Nation. He is being held at the Dewey County Jail in Oklahoma. His address is Dewey County Jail, P.O. Box 247, Taloga, Oklahoma 73667. Respondent Cecilia Blackman is the Supervisor of the Blackfeet Detention Center. Respondent, the Blackfeet Tribal Business Council, was established by Article III, Amendment IV of the Constitution and By-Laws for the Blackfeet Tribe of the Blackfeet Indian Reservation.²

10. This Court has jurisdiction over this case under 25 U.S.C. § 1303 and 28 U.S.C. §§ 1331 and 2241.

II. Course of Proceedings

A. Factual Background

11. Arocha's convictions – both tribal and federal – arose out of an altercation that occurred in East Glacier, Montana, on the Blackfeet Indian Reservation. Arocha's father was married earlier in the day and held a reception that lasted late into the night. At some point, the victim, Shane L., crashed the wedding

² Cecilia Blackman's address is P.O. Box 807, Browning, Montana 59417. The Tribal Business Council's address is All Chief's Square, P.O. Box 850, Browning, Montana 59417.

reception and stole some beer. A fight broke out between Shane L. and Arocha. As the fight escalated, Arocha stabbed Shane L. in the chest. Shane L. then disengaged from the fight and ran into a nearby grassy field. Arocha chased Shane L. into the field and stabbed him at least seventeen more times before he was pulled away by his brother. (PSR at ¶¶ 12-17; Attachment 1 at 2-3).

12. After Shane L. was taken to the hospital by ambulance, Arocha turned himself in to the tribal police. Shane L. died at the hospital several hours later. (PSR at ¶¶ 18-19; Attachment 1 at 2-3).

B. Tribal Court Proceedings

13. On July 5, 2017, the Blackfeet Tribe charged Arocha with Assault Resulting in Serious Bodily Injury, in violation of Chapter 5, Part II, Section 1(C), and Criminal Endangerment, in violation of Chapter 5, Part II, Section 4 of the Blackfeet Law & Order Code. He had an initial appearance on that same day and was released on \$3,500 bond pending trial. (Attachment 2).

14. As indicated earlier, Arocha's tribal court trial occurred on October 24, 2017. His lawyer, Thane Johnson, was present for the trial, but Arocha did not appear. According to tribal court records, Arocha contacted the Chief Clerk, Marie Talks About, and explained that "the federal judge told him that he couldn't attend or appear for court in Browning, Montana." The trial court determined, however, that there was no documentation stating that he could not attend tribal court

proceedings and held the trial in Arocha's absence in accordance with Blackfeet Tribal Resolution 111-99 and *Gervais v. Blackfeet Tribe*, (App. No. 2017-AP 04). At the conclusion of the trial, the jury convicted Arocha of both charges. (Attachment 1 at 1).

15. Following conviction, the trial court ordered a presentence Report, which was drafted by Blackfeet Tribal Probation Officer Neil Hammon. In the presentence report, Mr. Hammon notes that he contacted Arocha's federal probation officer and was informed that Arocha would "not be present for sentencing." (Attachment 1 at 2).

16. Arocha's sentencing hearing was held on November 8, 2017. Neither Arocha nor Thane Johnson attended the hearing. The Tribe argued for the maximum sentence of twelve months on the assault conviction and nine months on the criminal endangerment conviction. The Tribe went on to request that these sentences be ordered to run consecutive to one another, as well as to any sentence imposed in Arocha's federal case. It also asked the court to impose a fine of \$5,000 on the assault charge and \$1,000 on the criminal endangerment charge for a total fine of \$6,000, as well as \$775,000 in restitution. (Attachment 1 at 4). The trial court adopted, at least in part, the Tribe's recommendation. It ordered Arocha to serve a total of 21 months imprisonment, pay a \$6,000 fine and pay \$775,000 in restitution. Its sentencing order, however, was silent as to whether Arocha's tribal sentence

should run concurrently or consecutively to his federal sentence – which had not yet been imposed. (Attachment 1 at 5-6).

17. Shortly before Arocha completed his federal sentence, the Blackfeet Tribe filed a detainer with FCI Sandstone, where he was imprisoned. (Attachment 3). It also filed a petition for an order to hold Arocha following release from his federal sentence for transport to the Blackfeet Reservation. (Attachment 4). The trial court granted the petition, and Blackfeet law enforcement traveled to Pine County, Minnesota, and transported Arocha to Browning for service of his tribal sentence. (Attachment 5).

18. On September 14, 2022, Thane Johnson filed a writ of habeas corpus in the Blackfeet Appellate Court seeking “a determination that the Blackfeet Tribe lack[ed] the legal authority to put a hold on William Arocha, Jr.’s release from federal prison.” (Attachment 6 at 1). In support of this request, Johnson noted that, while the trial court sentenced Arocha to one year and nine months, it was “silent on whether the sentence would run concurrently or consecutively to the federal sentence.” Relying on federal and state case law, Johnson went on to argue that, because the trial court failed to expressly order that its sentence would run consecutively to Arocha’s federal sentence, there was an un rebuttable presumption that the two sentences should run concurrently. (Attachment 6 at 2-3).

19. In its response to this petition, the Tribe argued that Johnson used the wrong vehicle to secure Arocha's release. In making this argument, it noted that Blackfeet law limits the availability of the writ of habeas corpus to pretrial detainees. Under Chapter 11, Section 26 of the Blackfeet Law & Order Code, a writ of habeas corpus may only be filed by a "person who is detained in the Blackfeet Tribal Jail before any hearing on the merits of the charges against him or her." Based on this provision, the Tribe argued that Arocha's petition should be denied because: (1) he was not being held in the Blackfeet Tribal Jail;³ (2) he received a hearing on the merits of his case and failed to timely appeal the merits of his case; and (3) he was not being illegally held. (Attachment 7 at 2-3).

20. The Blackfeet Court of Appeals denied Arocha's petition but not on the grounds advanced by the Tribe. Instead, it denied the petition on the merits based on a finding that Judge Pepion's sentencing order clearly stated that Arocha's tribal sentence was "not to run concurrent with the federal sentence." (Attachment 8).

21. A week after the appeals court issued its order denying habeas relief, Johnson filed a Motion for a New Trial or, in the Alternative, for Relief from Judgment under Rules 54 and 55(b) of the Blackfeet Rules of Civil Procedure. As grounds for the motion, Johnson pointed out that, in denying Arocha's habeas corpus

³ Arocha was apparently being held in Pine County, Minnesota, when Johnson filed the petition for habeas corpus.

petition, the appellate court had erred in its reading of Judge Pepion's sentencing order. In his order, Judge Pepion recounted the recommendation of the Tribe, which specifically requested that Arocha's tribal sentence be ordered to run consecutive to his federal sentence. In the portion of his order setting forth the actual sentence, however, Judge Pepion was silent on this point. As Johnson expressed in his motion:

Judge Pepion was cognizant of the fact that Special Prosecutor Gray was asking that the sentence not run concurrent to the federal sentence. She expressly asked for it. Instead, Judge Pepion only ordered the two Tribal Court sentences to run consecutively. Judge Pepion knows how to run sentences consecutively, yet he was silent as to whether the Tribal Court sentence ran consecutively or concurrently to the federal sentence.

Based upon the fact that the appellate court made a clear mistake in the reading of the sentencing order dated February 2, 2018, this Court must grant relief from its decision or at least permit the parties to have oral argument on the issue.

(Attachment 9 at 2-3).

22. In response, the Tribe argued that Arocha's motion was both untimely and misplaced. It was untimely because Arocha's challenge to his sentence was made nearly four years after it was imposed – well past the deadline for filing for a new trial or relief from judgement. It was misplaced because it was filed under the Rules of Civil Procedure, which do not apply to criminal cases. (Attachment 10).

23. The trial court agreed with the Tribe and denied Arocha's motion because it was based on "the Blackfeet Rules of Civil Procedure and not the Blackfeet Rules of Criminal Procedure." (Attachment 11).

24. On November 17, 2022, the Blackfeet Tribal Court held a hearing to, it appears, re-impose its November 2017 sentence in Arocha's presence. At this hearing, Arocha was represented by a different attorney, Dave Gordon. Judge Pepion, Clerk Delores Iron Shirt, Prosecutor Shanell Horn, and Tribal Attorney Dawn Gray were also present. At the conclusion of the hearing, Judge Pepion sentenced Arocha to:

Count I: Assault C: Serious Bodily Injury – sentenced to one year incarceration and \$5,000 fine.

Count II: Negligent Endangerment – nine months incarceration and \$1,000 fine.

78 days credit for time served while in Pine County.

Sentence will run consecutively for a total of one year and six months.

\$6,000 fine will pay or serve at \$25 a day not to run concurrent with sentence.

Mr. Arocha will pay restitution in the amount of \$775,000 to the victim's spouse.

(Attachment 12 at 2).

25. On December 5, 2022, Thane Johnson filed a second notice of appeal. In the notice, he provided three bases for the appeal: (1) that the trial court erred when it resentenced Arocha after issuing its first sentence in 2018; (2) that the “first sentence is silent as to whether the sentences for negligent endangerment and assault ran concurrently or consecutively to the federal sentence;” and (3) that the trial court set a hearing without providing any notice to defense counsel, who had consistently represented Arocha in the Tribal Court matter. (Attachment 13). It is unclear from the record but it does not appear that Arocha’s appeal was ever addressed or ruled upon.⁴

C. Course of Proceedings in Federal Court

26. Arocha filed a *pro se* petition for writ of habeas corpus pursuant to 25 U.S.C. § 1303 and 28 U.S.C. § 2241(c)(3) on January 27, 2023. (doc. 5).⁵

Although they are reworded, Arocha raised the following claims in his *pro se* petition:

⁴ The notice of appeal may have been untimely. According to Chapter 11, Part II, Section 13(E) of the Blackfeet Law & Order Code, “an appeal from a judgment, decision, or order must be taken within ten (10) days after it is rendered.” Under Chapter 11, Part I, Section 4(A), papers filed in the Blackfeet Tribal Court “must be placed in the custody of the clerk within the time designated for filing.” Filing can be accomplished by mail, “but the filing shall not be timely unless the papers are actually received within the time fixed for filing.” *Id.*

⁵ See, *Arocha v. Blackman*, No. 22-CV-115-GF-BMM

Relying on *Spears v. Red Lake Band of Chippewa Indians*, 363 F.Supp.2d 1176 (D.Minn. 2005), he alleged that his 21 month sentence violates 25 U.S.C. §§ 1302(a)(7)(B) and (b).

He alleged that he was denied the right to counsel as guaranteed by 25 U.S.C. § 1302(a)(6) because Thane Johnson was not present at his sentencing hearing on November 8, 2017, and because his second lawyer, Dave Gordon, was not allowed to meaningfully participate in the hearing held on November 17, 2022.

He alleged that his sentence violated Chapter 8, Section 13 of the Blackfeet Law & Order Code because that section does not contain a provision allowing a tribal sentence to run consecutively to an unimposed federal sentence. He also alleged that his sentence runs afoul of the equal protection and due process guarantees set forth in 25 U.S.C. § 1302(a)(8).

He alleged that the Tribe violated 25 U.S.C. § 1302(c)(3) because the judge presiding over his case was not legally licensed to practice law and did not have sufficient legal training to preside over a criminal case.

He alleged that his rights under 25 U.S.C. § 1302(c)(4) were violated because Thane Johnson was not provided with a copy of Blackfeet Resolution 111-99. Resolution 111-99 amended Chapter 8, Section 3(2) of the Blackfeet Law & Order Code to give judges greater discretion to order a trial in absentia. *See, Gervais v. Blackfeet Tribe*, No. 2017-AP 04.

He alleged that his rights were violated because there was nothing in Judge Pepion's sentencing order that directed Arocha's tribal sentence to run consecutively to his unimposed federal sentence.

27. On February 28, 2023, this Court issued an order directing the Federal Defenders of Montana to locate counsel to represent Arocha. (doc. 7). The undersigned entered his appearance on March 20, 2023. (doc. 9).

III. Claims for Relief

A. Introduction

When a tribe issues an order detaining a person, the Indian Civil Rights Act (ICRA) provides that that person may challenge the legality of his detention by filing a writ of habeas corpus in federal court. Section 1303 of Title 25 states that “[t]he privilege of the writ of habeas corpus shall be available to any person, in a court of the United States, to test the legality of his detention by order of an Indian tribe.” A petitioner seeking relief under § 1303 is limited by the constitutional rights he is afforded under the tribe's constitution and the ICRA. *See* 41 Am. Jur. 2d Indians; Native Americans § 31. Thus, for example, a petitioner sentenced to a term of imprisonment of *less than a year* cannot make a claim under § 1303 that he was not afforded a public defender, unless he was guaranteed that right by the tribe's constitution. *Tom v. Sutton*, 533 F.2d 1101, 1105 (9th Cir. 1976).

In this case, Arocha maintains that he is entitled to relief because his 21 month sentence was imposed in violation of 25 U.S.C. § 1302(c) which states in pertinent part:

In a criminal proceeding in which an Indian tribe, in exercising powers of self-government imposes a total term of imprisonment of more than one year on a defendant, the Indian tribe shall –

1. provide to the defendant the right to effective assistance of counsel at least equivalent to that guaranteed by the United States Constitution; and

2. at the expense of the tribal government, provide an indigent defendant the assistance of a defense attorney licensed to practice law by any jurisdiction in the United States that applies appropriate professional licensing standards and effectively ensures the competence and professional responsibility of its licensed attorneys;
3. require that the judge presiding over the criminal proceeding –
 - A. has sufficient legal training to preside over criminal proceedings; and
 - B. is licensed to practice law by any jurisdiction in the United States

Arocha's convictions and sentence violates this provision because when it was imposed: (1) he was not represented by effective counsel and (2) the judge who imposed the sentence was not a licensed attorney. Arocha also maintains that his sentence was imposed in violation of the due process guarantee set forth in 25 U.S.C. § 1302(a)(8).

B. Arocha's Claims for Relief

Claim One – Arocha's right to be tried and sentenced before a judge who is licensed to practice law as required by 25 U.S.C. § 1302(c)(3) was violated.

Under § 1302(c)(3), a tribe who seeks to impose a sentence of greater than one year must ensure that the judge presiding over the defendant's case is a licensed attorney who "has sufficient legal training to preside over criminal proceedings."

Judge Pepion is not a licensed attorney. Therefore, because Arocha's sentence exceeded a year imprisonment, he could not preside over his trial and sentencing. *Coriz v. Rodriguez*, 347 F.Supp.3d 707, 717 (D.N.M. 2012). In light of this fact, this Court should order that Arocha's convictions and sentences be vacated.

Claim Two – Arocha's sentence violates 25 U.S.C. § 1302(c)(1) and (2) because he was not represented by counsel when it was imposed.

Section 1302(c) imposes requirements on Indian tribes who, "in exercising powers of self-government impose[] a total term of imprisonment of more than one year on a defendant." The first two of these requirements concern the type of representation that must be provided by a tribe. Subsection (1) of § 1302(c) requires tribes to provide effective assistance of counsel that is "at least equal" to that guaranteed by the United States Constitution. Subsection (2) requires tribes to provide indigent defendants with a public defender who is a licensed attorney. Arocha's "'total' prison term of [21 months], resulting from a single 'criminal proceeding' clearly falls within this provision." *Coriz*, 347 F.Supp.3d at 718 (citing *Johnson v. Tracy*, 2012 WL 4478801 at *1 (D.Ariz. 2012)).

Through passage of §1302(c), Congress sought to ensure that tribal court defendants who face punishment of more than one year in prison in a single criminal proceeding "receive something akin to a full panoply of procedural rights that would be due a criminal defendant. . ." *Miranda v. Anchondo*, 684 F.3d 844, 849 n.4 (9th Cir. 2012). As stated above, among the rights that were afforded under § 1302(c)

was the right to effective assistance of counsel. Because Arocha was not represented at his sentencing hearing, the trial court could impose a sentence of no more than one year. His 21 month long sentence violates the ICRA and should be reduced to one year. *Wilfong v. Johnston*, 156 F.2d 507 (9th Cir. 1946)(“We conclude that because of the failure of petitioner to be represented by counsel at the time of the pronouncement of judgment and sentence he was deprived of a constitutional right and, therefore, the judgment and sentence is void.”); *United States v. Tribote*, 297 F.2d 598, 601 (2d Cir. 1961)(“We are in agreement that appellant was entitled to the assistance of counsel when sentence was imposed.”).

Claim Three – Arocha was deprived of the effective assistance of counsel guaranteed by 25 U.S.C. § 1302(c)(1).

Section 1302(c)(1) guarantees the right to “effective assistance of counsel at least equal to that guaranteed by the United States Constitution” to tribal defendants who receive a sentence of more than one year. The test to determine whether a criminal defendant received effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution is set forth in *Strickland v. Washington*, 466 U.S. 668 (1984).

To demonstrate ineffective assistance of counsel, a petitioner must show: (1) that counsel’s representation fell below an objective standard of reasonableness under prevailing professional norms in light of the circumstances of the particular case; and (2) that it is reasonably probable that, but for counsel’s errors, the result of

the proceeding would have been different. *Strickland*, 466 U.S. at 687-94. The benchmark for establishing a claim of ineffective assistance is “whether counsel’s conduct so undermined the proper functioning of the adversarial process that the trial cannot be relied upon as having produced a just result.” *Id.* at 686.

Arocha maintains that his counsel, Thane Johnson, provided ineffective assistance of counsel in several respects. First and foremost, he failed to attend Arocha’s sentencing hearing. A lawyer’s failure to show up and attend his client’s sentencing hearing certainly meets the first prong of *Strickland*. As the D.C. Circuit noted in a case preceding *Strickland*:

We recognize that occasionally trial counsel will be prevented by other court business from appearing at the sentencing hearing. In such event it is counsel's duty to preserve his client's constitutional rights by seeking postponement of sentencing or by having substitute counsel present prepared to act on the defendant's behalf.

Gadsden v. United States, 223 F.2d 627, 632 (D.C. Cir. 1955).

Under *Strickland* it does not matter that Arocha was not present at his sentencing hearing. A defendant is entitled to effective assistance of counsel at sentencing whether or not he is in attendance. *Golden v. Newsome*, 755 F.2d 1478, 1481-82 (11th Cir. 1985)(defendant is entitled to effective assistance of counsel at sentencing, even when the defendant has escaped from custody and is not present); *Hall v. Moore*, 253 F.3d 624 (11th Cir. 2001). Thus, Johnson’s failure to attend Arocha’s sentencing was *per se* ineffective.

Although it may not be necessary to establish prejudice, Johnson’s failure to attend Arocha’s hearing certainly affected the outcome of the sentencing process.⁶ Had Johnson been present, he would have been able to object to Arocha’s sentence because it was imposed in violation of § 1302(c)(3). He also could have presented mitigating evidence and advocated for a lesser sentence. If his objection to the legality of Arocha’s sentence was overruled, Johnson could have raised this issue on direct appeal to the Blackfeet Court of Appeals. But, because he was not present, did not object, and did not file a direct appeal challenging the legality of the trial court’s sentence, Arocha is serving a sentence of greater than one year, which clearly violates § 1302(c). *Coriz*, 347 F.Supp.3d at 717.⁷

Claim Four – Arocha was denied his rights to equal protection and due process as guaranteed by 25 U.S.C. § 1302(a)(8).

Arocha’s trial and sentencing are marred by numerous irregularities. The Judge who presided over his case was not a lawyer as required by § 1302(c)(3), he

⁶ Because sentencing is a critical stage of the proceeding, and because Johnson was completely absent from this stage, Arocha was presumptively prejudiced under *United States v. Cronic*, 466 U.S. 648 (1984), and his sentence should therefore be vacated even without a showing of prejudice. *Golden*, 755 F.2d at 1483-84 (citing *Cronic*, 466 U.S. at 659 n.25. In *Cronic*, the Court noted that it has “uniformly found constitutional error without any showing of prejudice when counsel was either totally absent, or prevented from assisting the accused during a critical stage of proceeding.” *Id.*

⁷ Arocha was accompanied by counsel, Dave Gordon, at his November 2022 “resentencing” hearing. But, Mr. Gordon was not allowed to participate or advocate on Arocha’s behalf during the hearing.

was not represented by counsel at his sentencing hearing as required by § 1302(c)(2), and he was not represented by effective counsel who adequately represented his interests throughout the proceedings.

Presumably, the Blackfeet Tribe affords these rights to others who are similarly situated to Arocha. Its failure to do so in his case violates the equal protection guarantee set forth in § 1302(a)(8). Its failure to afford Arocha basic rights guaranteed by the ICRA also denied him the right to due process.

IV. Prayer for Relief

Based on the foregoing, this Court should issue a writ of habeas corpus pursuant to 25 U.S.C. § 1303 and 28 U.S.C. § 2241(c)(3) and order Arocha's immediate release.

RESPECTFULLY SUBMITTED this 2nd day of May, 2023.

/s/ David F. Ness

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2023, a copy of the foregoing document was served on the following persons by the following means:

1 CM-ECF
 Hand Delivery
2 Mail
 Overnight Delivery Service
 Fax
 E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. WILLIAM ALBERTO AROCHA, JR.
 Petitioner

/s/ David F. Ness