

A New Juvenile Justice System

Total Reform for a Broken System

Edited by Nancy E. Dowd

With a Foreword by Charles J. Ogletree, Jr.



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Collateral Consequences of Juvenile Court

Boulders on the Road to Good Outcomes

SUE BURRELL

Introduction

If you ask a roomful of successful adults if they committed acts as teenagers that violated the law, most will admit that they did.¹ Some were not caught; some were caught but turned over to their parents; and others were prosecuted but not made a ward of the court. They may not have behaved any better than the youth who were caught, but for the most part, they escaped the direct and collateral consequences of involvement with the juvenile justice system.

This chapter examines the collateral consequences of juvenile court proceedings, an area in which juvenile court intervention has become the antithesis of its original rehabilitative goals. It provides an overview of the consequences commonly experienced by youth and spotlights the disparate impact of those consequences on youth of color and poor youth. It discusses collateral consequences in relation to evolving concepts of adolescent development and effective practice. Finally, the chapter offers suggestions for eliminating or mitigating the barriers to success interposed by collateral consequences.

What Are Collateral Consequences?

The *direct* consequences of juvenile court involvement are themselves significant and life changing. As an immediate result of arrest, youth may be incarcerated in prison-like institutions, sometimes for years. Youth may suffer adult-type consequences such as the reporting of their DNA, fingerprints, and records to criminal registries; lifetime registration requirements for sex or gang crimes; and use of their juvenile

adjudications for sentencing enhancement. If their case is handled in the adult system, youth may be sentenced to do adult time.

Even youth who are involved in less serious misbehavior experience stigma and suffer considerable disruption in school and other parts of their lives. The court may impose a staggering array of conditions and orders, many of which require substantial time, effort, and resources to fulfill. It is common for a single court order to require youth to make restitution, go to counseling, be tested for drugs, perform community service, pay a fine, stay away from certain people or neighborhoods, be at home at a certain time, submit to law enforcement searches, and regularly attend school. For many youth, these expectations are overwhelming.

But direct consequences are not the only ones that flow from juvenile court involvement. And although the law is evolving to require more complete advice about the consequences of admitting to or being found guilty of a crime,² most young people have little understanding of the pervasive impact that such consequences may have on their future. Depending on the offense, youth may find it difficult to get back into school, apply for financial aid, join the military, adjust their immigration status, live in public housing, hold a driver's license, or successfully navigate employment interviews. The *collateral* consequences of something they did as a teenager may follow them for their entire lives.

Collateral consequences include literally dozens of additional sanctions or limitations resulting from juvenile court involvement. Some are imposed by agencies that have nothing to do with juvenile court. Departments of motor vehicles, licensing agencies for various professions, housing authorities, the Department of Homeland Security, colleges and universities, public benefits agencies, and financial aid organizations are among the entities that impose collateral consequences on an independent basis.

Many collateral consequences are mementoes of the “get tough” era in juvenile justice—they are simply imposed for punishment. Some are experienced early on, and others become manifest years down the road when the young person wants to pursue some life goal. Among the areas potentially impacted by juvenile court involvement are

- liability for legal representation, service costs, civil judgments;
- getting or keeping a driver's license;
- being allowed to attend regular high school;
- applying to college and for financial aid;
- obtaining a job;
- qualifying for a professional license;
- living in public housing;
- securing or keeping legal immigration status;
- being able to serve in the military;
- qualifying for public benefits;
- being a foster parent or relative caregiver; and
- traveling within the U.S. or abroad.

In other words, many of the very things we want youth to do to demonstrate success and rehabilitation are made more difficult by collateral consequences. Youth who want to comply with the court's orders but need transportation to get to meetings and appointments find that their driver's license has been suspended or that they must wait a substantial period before applying for one. Thus, in California, youth aged 13 to 21 face mandatory license suspension or delay in eligibility to be licensed for a wide range of drug and alcohol offenses and vandalism.³ Discretionary suspension reaches even more broadly to include offenses such as truancy, prostitution, or using false identification to buy liquor.⁴ There are literally dozens of ways youth may lose their driving privileges in California.⁵

Youth who manage to get through high school find that the Common Application⁶ used for admission to many colleges asks them to disclose juvenile adjudications—placing them at an immediate disadvantage. Youth who want to join the military find that every juvenile contact with the justice system must be reported and that in many cases a waiver must be obtained to make them eligible for enlistment. For example, the U.S. Army requires disclosure of “records of arrest, charges, juvenile court adjudications, traffic violations, probation periods, and dismissed or pending charges or convictions, including those that have been expunged or sealed.”⁷ A waiver to permit enlistment is required for anyone convicted of a felony.⁸ Youth otherwise meeting the requirements to go

into nursing or the practice of law find that state licensing laws restrict them—often many years down the road. Thus, for example, the California Board of Registered Nursing considers the existence of a “conviction or act” for a broad range of offenses to be substantially related to practicing as a nurse and reviews applications with prior convictions on a case-by-case basis.⁹ Although the regulations refer to “convictions” and do not mention juvenile adjudications, the LiveScan process used to do background and fingerprint checks may turn up juvenile contacts (juvenile felonies are reported to the Department of Justice in California),¹⁰ and some counties also collect and submit fingerprints. Although juvenile contacts should not be disclosed to potential employers, they sometimes are. And since the regulatory language also covers past “acts” that are not convictions, youth may wind up having to deal with juvenile records in the licensure process.

There are additional barriers in other areas of life. Youth who, decades later, want to become foster parents or relative caregivers find that their juvenile record is used to disqualify them. Youth seeking to adjust their immigration status find that “bad acts” as a juvenile are used to deny them admission to the country or are used as grounds for deportation.¹¹ Families of youth who were in trouble with the law encounter exclusion or eviction from public housing if the youth was involved in drug-related activity or other criminal activity deemed to “threaten the health, safety or right to peaceful enjoyment of the premises.”¹²

How Do Collateral Consequences Work?

Collateral consequences work in a variety of ways. Some are specifically required by law. It is common, for example, for state laws to call for suspension of the driver’s license of any youth adjudicated for driving under the influence of alcohol. In some cases, the juvenile court is required to give notice of adjudications to other agencies, and in others, the agencies may contact the juvenile court or state records agency to learn about adjudications or other juvenile contact with the system.

Other collateral consequences are discretionary. For example, being adjudicated for certain offenses may result in automatic suspension or expulsion from school, but for other offenses, suspension or expulsion may be discretionary. Similarly, applications for jobs or college may re-

quire disclosure of juvenile adjudications but provide for a case-by-case determination whether the juvenile record is disqualifying.

Many states have eviscerated the rules that, until the 1990s, had kept juvenile records confidential. This has made it possible for almost anyone with a computer to learn what a young person did that got him or her arrested. Even when the law does not permit disclosure, the broad availability of electronic records results in improper disclosure and misunderstandings. It is not unusual to find “rap sheets” that include juvenile contacts even though they should not be reported, and a few states actually sell juvenile records to private companies.¹³

Improper disclosure of juvenile court history is exacerbated by confusion about the law or lack of clarity about what must be disclosed. For example, many licensing agencies or employers want to know about criminal *convictions*. Although juvenile adjudications are technically not *convictions*, those who respond to records requests and those who request records are not always careful about the distinction. This situation results in improper disclosure and improper use of juvenile court adjudications to disqualify youth or put them at a substantial disadvantage. It also creates problems for youth who may have truthfully stated that they have no *convictions*. Although their answer is legally correct, they face being perceived as liars or forced to explain their past—hardly the best way to make a good first impression.

Lack of Advocacy to Assure Fairness in Collateral Consequences

There is little oversight over wrongful disclosure of juvenile records. Youth may not understand the law or be aware of their rights in relation to wrongful disclosure. Also, record-sealing laws in many states are complicated and sometimes prohibitively expensive for youth from low-income families to use in order to shield their record from public view.

Resources are few and far between to provide advocacy to youth in relation to collateral consequences. Few public defender offices have resources to represent youth in postdisposition school, employment, or record-sealing proceedings, even though success in school and work are central to fulfilling the goals of court intervention. Moreover, some of the collateral consequences, such as fighting eviction from public housing or appearing before licensing boards, require specialized knowledge

of the law, and youth are even less likely to obtain civil legal services than they are to engage criminal legal help.

Strategic, skilled approaches could help to prevent or mitigate many consequences, but youth have no one to help them. In the diverse situations in which informed decisions are needed to assist in applications or interviews, most youth are completely on their own. This is especially so because collateral consequences may surface many years after the juvenile court case is over.

Who Is Hurt by Collateral Consequences?

The demographics of youth involved in juvenile court cases provide additional grounds for concern about collateral consequences. The youth arrested, tried, and incarcerated in our juvenile system are disproportionately youth of color.¹⁴ Most are from poor or economically struggling families. Many live in racially marginalized communities lacking the kinds of support that youth need to grow to healthy adulthood. Also, compared to the general youth population, they have a much higher prevalence of developmental disabilities, mental illness, and histories of trauma or abuse.

Youth of color and poor kids regularly experience the full impact of the court system, at least in part because they have less access to the supports that could help them to avoid it. Also, misbehavior by youth of color is all too often evaluated through a racial lens. Instead of being viewed in the context of the young person's traumatic life experiences or as the onset of mental illness, their behavior is seen as evidence of a criminal character. Instead of being sent to a therapist or a diversion program facilitated by family resources, youth of color face the full brunt of prosecution. Afterward, they are subjected to dozens of rules and restrictions that make it more difficult to move beyond age- or disability-related delinquency.

In sum, our system prosecutes the youth who have the most challenges and the least amount of resources to begin with and then heaps additional obligations on them. It imposes rules and restrictions that interfere with or prevent them from obtaining support that could help them to dig out. The direct and collateral consequences limit their access to the very areas most critical to success—education, jobs, and mobility.

Youth who succeed in moving forward do so in spite of our system, not because of it.

Why Should We Care?

The astronomical growth of collateral consequences over the past two decades has coincided with fear and misperceptions about juvenile crime. It has also been fueled by a misguided belief that punishment acts as a deterrent to young people—that if we give them sufficient reason to reflect on their acts, they will think twice before engaging in future delinquency.

While there is certainly a place for age- and offense-appropriate accountability, this piling on of consequences is counterproductive. Youth in juvenile justice are already under a crushing load of responsibilities imposed by the court. Many collateral consequences have nothing to do with the underlying offense, and many surface years down the road. Because of these consequences, doors close for youth, or they are placed at a distinct disadvantage. With so much stacked against them, some youth may simply give up.

This outcome affects all of us. If youth are unable to successfully pursue higher education and employment that enables them to be self-sustaining, they are more likely to reengage in criminal behavior. They are more likely to need public benefits. Their own children and families suffer, and this contributes to a horrible cycle of poverty and involvement in the criminal justice system. By perpetuating a system in which youth are unable to succeed, we deprive our community of the energy, skills, and creativity that young people would contribute if they were not so hobbled by their juvenile past.

What about Public Safety?

Adolescence is a time of risk taking and impulsive behavior. Our laws recognize this in setting the age of majority for many adult responsibilities such as voting, joining the military, or being responsible for contracts. Research on adolescent development and on the age at which the human brain fully matures confirms that the wild teenager at 16 is not the person he or she will be at age 25.¹⁵

The behavior of youth in the juvenile justice system is not different from that of other teenagers, but for the fact that they were caught. Surveys of juvenile court professionals reveal that a majority engaged in behavior as teenagers that, had they been arrested, could have been charged as a felony.¹⁶ Their crimes include armed assaults, sex crimes, robberies, drug sales, intoxicated driving, and a broad array of seriously reckless activities. Almost without exception, these successful professionals report that, had this behavior been known to admissions officers in higher education, licensing authorities, and future employers, it would have interposed a barrier to their ability to move forward in their lives. Further, almost every person surveyed considers his or her behavior to have been a function of immaturity, and not something that should be used to judge him or her years down the road.¹⁷

In fact, most youth who get into trouble with the law are unlikely to become career criminals. National research indicates that six out of ten juveniles who enter the juvenile justice system never return on a new referral.¹⁸ The federal “Pathways to Desistance” study found that only a small proportion of juvenile offenders studied over a seven-year period continued to offend at a high level throughout the follow-up period. The great majority reported low levels of offending after court involvement, and a significant portion of those with the highest levels of offending reduced their reoffending dramatically.¹⁹

What Can We Do?

We need to reconnect with our original mission of helping youth in juvenile justice to successfully move forward. No one strategy will address every collateral consequence, but here is a beginning list of areas that merit attention. A refocused juvenile justice system would eliminate or sharply reduce collateral consequences and aim toward supporting youth to achieve success and well-being as adults. The first few strategies suggested here relate to juvenile court process; the remainder focus on broader community issues.

1. Keep More Youth Out of the System

Research has established that youth subject to formal juvenile court processing have worse outcomes than do youth with similar characteristics who escape formal scrutiny.²⁰ Our own experiences confirm that many individuals had extensive involvement in criminal activity as juveniles but became law-abiding and successful without court intervention. While we do not know for certain how much collateral consequences contribute to this result, the research suggests a need to look closely at whether formal interventions are truly needed. Allowing more youth to move forward in school, work, and skill development without the punitive burdens stemming from juvenile court involvement may greatly increase successful outcomes. This may be accomplished through the development of better support services to help families address their children's behavior, so formal intervention is not needed. When intervention is needed, it can be achieved in many more cases through community-based diversion or informal supervision programs that view youth as students, athletes, artists, and helpers—not as criminals.

2. Increase Juvenile Court Professionals' Understanding of Collateral Consequences

Judges, probation officers, prosecutors, and defense counsel need much more comprehensive knowledge about potential consequences in order to exercise proper judgment in individual cases. The American Bar Association is leading a national effort to heighten awareness of these issues by providing state-by-state information on specific consequences.²¹ In addition, a number of states have developed their own collateral consequences handbooks and guides.²² Until the substance of collateral consequences changes, information and knowledge is critical for youth, parents, and communities.

3. Fully Advise Youth about Consequences during the Court Process

Youth need to understand potential consequences in the course of making decisions about the risks of going to trial, whether to admit the offense, or whether to accept a plea bargain. Also, by focusing on

potential consequences at the outset, youth may be able to prevent or mitigate key consequences. For example, a plea agreement that allows the youth to admit to a slightly different offense than what was charged could help to save him or her from losing driving privileges. An agreement to admit a lesser offense could help to convince military recruiters that the offense is less serious than what was charged and that the youth should be able to enlist.

4. Assure Access to Advocacy Services after the Court Case Is Over

While juvenile defense counsel is obligated to help youth throughout the period of juvenile court jurisdiction, many collateral-consequences issues come up later. Jurisdictions should assure that youth no longer under court jurisdiction have access to free assistance to legal advice and representation in collateral-consequences-related proceedings. They may need help in filling out applications, deciding how to handle their juvenile record in employment interviews, seeking dismissal or sealing of juvenile records, or presenting their case to a licensing board. These services could be provided by legal services organizations, public defender offices, volunteer attorney programs in bar associations, or legal clinics at law schools. Information about these services should be disseminated to youth during the court process.

5. Restore Confidentiality of Juvenile Records

In many states, juvenile confidentiality rules have been largely abandoned except for very minor offenses. State statutes often hold that youth have no right to confidentiality in cases involving whole categories of offenses. These categorical exclusions from confidentiality should be reconsidered and reduced. There are huge factual differences in cases charged as robberies and assaults, for example, and they should not all be treated the same. Instructions for record sealing should also be readily available through the court's public information system.

Also, recognizing that employers, educators, law enforcement, and other agencies may have genuine interests that require *some* disclosure of juvenile records, we can still do a much better job of addressing legiti-

mate “need to know.” Jurisdictions can redraw the lines in a way that recognizes legitimate needs but eliminates the unfairness and overbreadth of current rules and practices. Shifting toward laws that make records confidential, except in cases of serious violent convictions, will help to provide better balance.

6. Make It Easier, Cheaper, and Faster to Seal Juvenile Records

Many youth fail to seal their records even when they are eligible to do so. Some youth do not know they have the right to seal their record, and others do not understand why it is important. Still others are intimidated by complex filing processes and the difficulty of finding anyone who can help to explain what they need to do. And finally, record sealing is simply too expensive in some places. With fees of as much as \$150 in some court systems, plus a substantial expenditure in time away from school or work, youth literally cannot afford to seal their records.

Jurisdictions should consider adopting rules for the automatic sealing of less serious offenses at the time youth successfully complete probation.²³ This would assure that low-level offenders benefit from the intended protections of record-sealing laws and would reduce courts’ workload in cases likely to result in sealing anyway. Sealing provisions for youth who do not qualify for automatic sealing should be free or very low cost, should provide for a court hearing, and should permit application within a short period after successful completion of court jurisdiction; and the criteria should relate to rehabilitative success, not the nature of the offense.

In addition, jurisdictions should provide a mechanism for delayed dismissal of the case.²⁴ Youth sometimes report that their chances for getting a professional license, joining the military, or other endeavors would be greatly enhanced if the underlying juvenile adjudication were removed. While this may not be appropriate in every case, jurisdictions should assure that, for cases meriting such consideration, dismissal in the interest of justice is possible. Such rules should be written to accommodate situations that arise many years after the juvenile case has been closed.

7. Restrict the Transfer of Juvenile Records and Provide Better Oversight

In the age of computers and the Internet, disclosure of confidential information is a persistent threat. This means that even when the law would limit disclosure, once records are published, there is little ability to control who sees them. It is common, for example, for “rap sheets” to include juvenile contacts with the law and even sealed juvenile offenses. Private record-checking companies with access to these records may be contacted by prospective employers and may disclose this information with impunity.

Juvenile records laws must be written to strictly prohibit redisclosure of confidential information and to impose strong penalties for violations. For example, legislation enacted in Washington State significantly broadened eligibility for record sealing and imposed substantial penalties for wrongful disclosure.²⁵

8. Prohibit Inclusion of Juvenile Records in Applications and Clarify What Is Required

The American Bar Association has adopted a resolution urging federal, state, territorial, and local governments to limit the collateral consequences imposed as a result of contact with the juvenile justice system.²⁶ This is surely one of the most powerful ways to assure that juvenile adjudications are not used in college, employment, and other applications.

Also, it is critical that applications do a better job of explaining what must be disclosed. Even though many employment, licensing, college, and financial aid applications already require only disclosure of adult “convictions,” many people do not understand the difference between juvenile “adjudications” and criminal court “convictions.” One very helpful improvement would be to request that applications explain what a conviction is and to clarify that juvenile adjudications need not be disclosed.

9. Create More Second Chances for Youth

Beyond all the needed changes in law and professional training, we must not lose sight of the need to help individual youth. The importance of

individual support is compelling in this account from Starcia Ague, who was in the juvenile system as a teenager and has now become a powerful advocate for reducing collateral consequences:

After I graduated, I applied for 35 jobs. I got just two calls back and went in for one interview with a telemarketing company. I got the job . . . and I was so excited! But then they said, “Just one more thing. On the question about felony convictions on the job application, you put down ‘will discuss upon interview.’ So . . . discuss.” I told them my story . . . and they told me good-bye. Miracle of miracles, and again through the help of people who believed in me, I did finally get a job in Seattle as a research assistant with Dr. Trupin at the University of Washington. But I was turned down for housing by three different landlords. I have great credit, but I couldn’t pass a background check. Fortunately, I found another WSU Alumnus with a rental house who gave me a break.²⁷

Youth are much more likely to successfully transition to adulthood if as many doors as possible remain open to them. Sometimes, this requires the help of a compassionate, supportive adult willing to give them a chance.

In fact, some of the best opportunities for system-involved youth have developed out of the frustrations experienced in trying to move beyond having a juvenile record. In California, for example, Homeboy Industries, Barrios Unidos, and the Youth Justice Coalition provide a welcome mat for youth, as well as offering employment opportunities and advocacy services to help them to apply for school and jobs. These programs are lifesaving and deserve to be much more richly supported by juvenile justice policy makers.

Conclusion

Our system of collateral consequences is out of balance with fundamental principles of juvenile justice. If we want youth to move beyond juvenile “delinquency,” we need to recognize that what we are doing in many instances is hurting rather than helping. These suggestions offer a place to start to change laws and practices that impede youth in attaining self-sufficiency and community success.

NOTES

- 1 Surveys of “Collateral Consequences on a Personal Level,” conducted by the author during workshops at the Administrative Office of the Courts Beyond the Bench XXI Conference, San Francisco, California, December 16, 2011; the California Public Defenders Association Juvenile Law Seminar, Monterey, California, January 21, 2012; and “Reforming the Juvenile Justice System: A Workshop for Change,” University of Florida Levin College of Law, Gainesville, Florida, April 26–27, 2013.
- 2 *Padilla v. Kentucky*, 559 U.S. ___, 130 S. Ct. 1473 (2010), for example, required that a defendant be advised of the immigration consequences of his or her plea.
- 3 Cal. Veh. Code § 13202.5; Cal. Veh. Code § 13202.6.
- 4 Cal. Veh. Code § 1302.7(a); Cal. Veh. Code § 13201.5 (a); Cal. Veh. Code § 1302.5(a).
- 5 Sue Burrell and Rourke F. Stacy, eds., *Collateral Consequences of Juvenile Delinquency Proceedings in California: A Handbook for Juvenile Law Professionals* (San Francisco: Pacific Juvenile Defender Center, 2011), 45–64.
- 6 The Common Application is used by close to 500 member colleges and universities. The 2013–2014 First Year Application is available at <https://www.commonapp.org/CommonApp/DownloadForms.aspx>.
- 7 Army Regulation 601-210, Personnel Procurement, Active and Reserve Components, Rapid Action Revision (RAR) (Feb. 1, 2013), § 2-11(a), § 4-7(a).
- 8 *Id.*
- 9 16 Cal. Code of Regs. § 1444.
- 10 Cal. Welf. & Inst. Code § 602.5.
- 11 See, for example, 8 U.S.C. § 1227(a)(2) (conduct-based grounds for deportation), 8 U.S.C. § 1182(a)(1) and (a)(2) (conduct-based grounds for inadmissibility).
- 12 42 U.S.C. § 13661, 24 C.F.R. 5.854 and 982.553 (exclusion); and § 13662 (a)(2) (termination of tenancy).
- 13 George Yeannakis, “Collateral Consequences of Juvenile Records: They Are Not Collateral and They Can Be Forever,” webinar (Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, National Training and Technical Assistance Center, February 21, 2013).
- 14 See, for example, Francisco A. Villarruel, Nancy E. Walker, and Pamela Minifree, *¿Dónde Está La Justicia? A Call to Action on Behalf of Latino and Latina Youth in the U.S. Justice System* (Building Blocks for Youth, 2002), 1–2; National Council on Crime and Delinquency, *And Justice for Some: Differential Treatment of Youth of Color in the Justice System* (January 2007), 1–3; and W. Haywood Burns Institute, *Unbalanced Juvenile Justice: An Interactive Data Map*, <http://data.burnsinstitute.org/#comparison=2&placement=1&racess=2,3,4,5,6&offenses=5,2,8,1,9,11,10&year=2011&view=map>.
- 15 Much of this work has been developed by and is available through the MacArthur Foundation Research Network on Adolescent Development and Juvenile Justice: <http://www.adjj.org/content/index.php>.

- 16 Surveys of “Collateral Consequences on a Personal Level,” *supra* note 1.
- 17 *Id.*
- 18 Howard N. Snyder and Melissa Sickmund, *Juvenile Offenders and Victims: 2006 National Report* (Washington, DC: National Center for Juvenile Justice, with the support of the U.S. Department of Justice, Office of Justice Programs, 2006), 234–235.
- 19 Edward P. Mulvey, *Highlights from Pathways to Desistance: A Longitudinal Study of Serious Adolescent Offenders*, OJJDP Juvenile Justice Fact Sheet (Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, March 2011), 4; and see MacArthur Foundation, *Research on Pathways to Desistance: Research Update Created for the Fourth Annual Models for Change National Working Conference* (December 9, 2009), <http://www.modelsforchange.net/publications/239>.
- 20 Anthony Petrosino, Sarah Gluckenberg, and Carolyn Turpin-Petrosino, “Formal System Processing of Juveniles: Effects on Delinquency,” *Campbell Systematic Reviews* 6, no. 1 (2010): 36.
- 21 The American Bar Association Juvenile Collateral Consequences Project page is “Think Before You Plead: Juvenile Collateral Consequences in the United States,” at <http://beforeyouplea.com/> (accessed November 7, 2013).
- 22 See, for example, Burrell and Stacy, *supra* note 5; Pennsylvania Juvenile Indigent Defense Action Network, *Pennsylvania Juvenile Collateral Consequences Checklist* (Philadelphia: Pennsylvania Juvenile Indigent Defense Action Network [PA-JIDAN], 2010); Kim Ambrose and Alison Millikan, *Beyond Juvenile Court: Long-Term Impact of a Juvenile Record* (Seattle: Washington Defender Association, 2011); Carlos J. Martinez, Ruck Deminico, Kevin Hellman, and Tamara Gray, *For Minors in Miami Dade, Florida—Consequences of Your Arrest, Plea and Trial* (Miami: Office of Carlos J. Martinez, Public Defender, 2008).
- 23 See, for example, Cal. Welf. & Inst. Code 786, added by S.B. 1038 (Leno) ch. 249, Stats. 2014.
- 24 See, for example, Cal. Welf. & Inst. Code 782, as amended by S.B. 1038 (Leno) ch. 249, Stats. 2014.
- 25 Washington HR 1651, 2013–2014 session, the Youth Opportunities Act, effective June 12, 2014, <http://apps.leg.wa.gov/billinfo/summary.aspx?i=1651&year=2014>. Advocacy to further restrict online access to unsealed juvenile records continues in Washington State.
- 26 The American Bar Association policy urging the limitation of collateral consequences affecting juveniles is Policy 102A, adopted February 9, 2010, available at <http://www.campaignforyouthjustice.org/documents/ABA%20-%20102A%20-%20Collateral%20Consequences%20for%20JuvenilesRev.pdf>.
- 27 “Starcia Ague: Juvenile Offender Turned Advocate,” *Juvenile In Justice*, February 23, 2013, <http://www.juvenile-in-justice.com/good-news-starcia-ague>.