

Memorandum

To: Kathryn Brubaker, Nevada Juvenile Justice Oversight Commission
From: Savannah Reid, Clinical Law Student
Re: Materials for December 14, 2018 JJOC Meeting
Date: December 6, 2018

Attached please find the following summary materials to accompany our presentation at the December 14, 2018 meeting of the Juvenile Justice Oversight Commission (12 pages total):

1. *Nevada Juvenile Fees (2018 Fact Sheet, 2 pages)*

Nevada Children's Advocacy Alliance and UC Berkeley Policy Advocacy Clinic, summarizing Nevada's juvenile fee practices

2. *Debtor's Prison for Kids: The High Cost of Fines and Fees in the Juvenile Justice System (2016 Executive Summary, 3 pages)*

Juvenile Law Center, documenting the widespread practice in states across the country of charging fees in the juvenile justice system

3. *Making Families Pay: The Harmful, Unlawful, and Costly Practice of Charging Juvenile Administrative Fees in California (2017 Executive Summary, 3 pages)*

UC Berkeley Policy Advocacy Clinic, documenting how juvenile fees harm families and undermine youth rehabilitation

4. *Research Note: Justice System–Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders (2016 Abstract, 1 page)*

Criminologists Alex Piquero & Wesley Jennings, finding that juvenile fees increase the likelihood of youth recidivism

5. *Resolution Addressing Fines, Fees, and Costs in Juvenile Courts (2018, 3 pages)*

National Council of Juvenile and Family Court Judges, calling on juvenile court judges to reduce or eliminate juvenile fees

These summary documents reference many other resources that may be of interest, but we hope this provides useful background for Commission members and the public.

Thank you for your help. We look forward to meeting you in person next week.



Juvenile Fees in Nevada

Nevada's juvenile justice system has received increased attention in recent years.

Nevada's Children's Advocacy Alliance highlights the need for statewide reform through its KIDS COUNT Data Center, which shows that the state is ranked 47th in child well-being.¹

In 2016, the U.S. Department of Justice's Office of Juvenile Justice and Delinquency Prevention selected Nevada as the only state to receive assistance in undertaking a review of its juvenile justice system.²

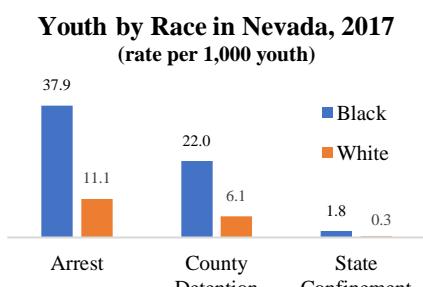
In response to these developments, in 2017 the state legislature enacted Assembly Bill 180 to establish a Juvenile Justice Bill of Rights and Assembly Bill 472 to reduce recidivism rates and improve other outcomes for youth in the juvenile justice system.³

In spite of these recent gains, Nevada law still permits courts and state agencies to assess and collect a broad range of fees from families with youth in the juvenile justice system.⁴

County fee practices vary in Nevada, but national research has found that such fees:

- (1) generate little net revenue,
- (2) disproportionately impact low-income people of color, and
- (3) undermine youth rehabilitation and public safety.

Low revenue: Juvenile fee collection rates and net revenue are low because families with youth in the system cannot afford to pay. In fiscal years 2017 and 2018, the state Division of Child & Family Services collected less than \$8,000 and the Clark County Department of Juvenile Justice Services collected less than \$25,000 from the families with youth in the juvenile justice system.⁵



Source: Nevada Juvenile Justice Programs Office (2017)

Racial disparities: Juvenile fees fall hardest on families of color. In Nevada, Black youth are overrepresented at every stage of the process.⁶ In 2017, Black youth were three times more likely than White youth to be arrested and placed in county detention and six times more likely to be placed in state confinement.⁷

High harm: Juvenile fees harm families and increase recidivism, undermining youth rehabilitation and public safety.⁸ In Nevada, failure to pay fees exposes vulnerable families to collection actions, negative credit scores, contempt of court, driver's license suspension, prevention of record sealing, and criminal liability.⁹

As a result of these harmful outcomes, the Reno-based National Council of Juvenile and Family Court Judges, the Nevada Chapter of the U.S. Civil Rights Commission, Nevada's Kenny Guinn Center for Policy Priorities, Nevada's Children's Advocacy Alliance, the Juvenile Law Center, and the American Bar Association have all recommended that state and local jurisdictions reduce or eliminate juvenile fees.¹⁰



References

¹ THE ANNIE E. CASEY FOUND., 2018 KIDS COUNT DATA BOOK: STATE TRENDS IN CHILD WELL-BEING (2018), <https://www.aecf.org/resources/2018-kids-count-data-book/> (ranking based on composite rankings data from other domains, including economic well-being, education, health, and family and community).

² *Nevada Launches Comprehensive Review of Juvenile Justice System*, NEV. GOVERNOR BRIAN SANDOVAL (July 12, 2016), <http://gov.nv.gov/News-and-Media/Press/2016/Nevada-Launches-Comprehensive-Review-Of-Juvenile-Justice-System/> (announcing the creation of an inter-branch task force to analyze Nevada's juvenile justice system).

³ Juvenile Justice Bill of Rights, A.B. 180, 79th Cong. (2017); Juvenile Justice System Reform Act of 2017, A.B. 472, 79th Cong. (2017) (creating a juvenile justice oversight commission, statewide uniform risk assessments, and requiring implementation of other statewide reforms).

⁴ See, e.g., NEV. REV. STAT. § 62B.130 (county detention fees); §§ 62B.140, 62E.540, 63.430 (state detention fees); § 62C.210 (informal probation and work program fees); § 62D.030 (attorney's fees); § 62E.210 (alternative program fees); § 62E.300 (disposition proceeding fees); § 62E.620 (drug treatment fees). Juvenile fees are separate from punitive fines and victim restitution. Although the focus of this fact sheet is on fees, all monetary sanctions, including fines and restitution, can have harmful effects on youth and their families.

⁵ Nev. Div. of Child & Family Servs., Court Ordered Child Support Collected – Historical Trend (2018) (on file with Policy Advocacy Clinic, Berkeley Law, Univ. of Cal.); Clark Cty., Nev., Dept. of Juvenile Justice Servs., Payment Center Deposits Summary – Historical Trend (2018) (on file with Policy Advocacy Clinic, Berkeley Law, Univ. of Cal.).

⁶ See, e.g., CLARK CTY., NEV., DEP'T OF JUVENILE JUSTICE SERVS., STATISTICAL REPORT (2017), <https://www.clarkcountynv.gov/jjs/Documents/Databook/2017%20Databook.pdf> (summarizing demographic data on youth that come into contact with Clark County's juvenile justice system).

⁷ Div. of Child & Family Servs. of Nev., Juvenile Justice Data, http://dcfs.nv.gov/uploadedFiles/dcfsnvgov/content/Programs/JJS/Juvenile_Justice_Data.pdf (detailing demographic data on youth that come into contact with Nevada's juvenile justice system).

⁸ POLICY ADVOCACY CLINIC, BERKELEY LAW, UNIV. OF CAL., MAKING FAMILIES PAY: THE HARMFUL, UNLAWFUL, AND COSTLY PRACTICE OF CHARGING JUVENILE ADMINISTRATIVE FEES IN CALIFORNIA (2017) (finding that juvenile fees undermine youth rehabilitation); Alex Piquero & Wesley Jennings, *Research Note: Justice System–Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders*, YOUTH VIOLENCE & JUV. JUST. (2017) (finding that the imposition of fees and costs on youth and their families led to a higher rate of recidivism).

⁹ § 62B.420 (2015) (authorizing juvenile courts to enter a civil judgment against a child and parent to collect unpaid fees and state or local entities to report judgments to credit reporting agencies); §§ 62E.040, 62B.420 (2015); § 62B.120 (2003) (authorizing judges to find individuals over the age of 18 in contempt of court for failure to pay fees); § 62B.420 (2015) (authorizing suspension of driver's license for failure to pay fees); § 62H.130 (2015) (preventing record sealing for failure to pay fees); § 62E.040 (2003) (authorizing courts to find adults guilty of a misdemeanor for failure to pay fees).

¹⁰ See Nat'l Council of Juvenile & Family Court Judges, Resolution Addressing Fines, Fees, and Costs in Juvenile Courts (2018) (calling on juvenile court judges to eliminate fines, fees, and costs); NEV. ADVISORY COMM. TO THE U.S. COMM'N ON CIVIL RIGHTS, MUNICIPAL FINES AND FEES IN THE STATE OF NEVADA (2017) (raising concerns about the effects the collection of juvenile fines and fees has on youth rehabilitation and the disparate impact on youth of color); Kenny Guinn Ctr. for Policy Priorities, *The Costs of the Nevada Juvenile Court System on Youths and Their Families* (Sept. 15, 2016), <https://guinncenter.org/juvenilecourt/> (detailing the fines and fees imposed in Nevada's juvenile court system and the deleterious consequences of such for youth); STAFF OF NEV. LEGISLATIVE COMM. ON CHILD WELFARE & JUVENILE JUSTICE, WORK SESSION DOCUMENT (2018) (recommendation by the Children's Advocacy Alliance for a waiver program in Nevada to defray costs of juvenile fines and fees for socioeconomically disadvantaged families); JESSICA FEIERMAN ET AL., JUVENILE LAW CTR., DEBTOR'S PRISON FOR KIDS? THE HIGH COST OF FINES AND FEES IN THE JUVENILE JUSTICE SYSTEM (2016) (documenting the widespread practice in states across the country of charging fines and fees in the juvenile justice system); AM. BAR ASS'N, REPORT TO THE HOUSE OF DELEGATES (2018) (adopting Resolution 114 that addresses the fundamental unfairness of disproportionate sanctions due to inability to pay fines and fees for racial minority and low-income youth and families).

DEBTORS' PRISON FOR KIDS?

The High Cost of Fines and Fees in the Juvenile Justice System

By Jessica Feierman with Naomi Goldstein, Emily Haney-Caron and Jaymes Fairfax Columbo

EXECUTIVE SUMMARY

While much is now known about the financial burdens imposed on individuals and families by the assessment of costs, fines, fees, and restitution in the adult criminal justice system, there has been scant attention paid to this issue in the juvenile justice system. To address this gap, with the support of the Laura and John Arnold Foundation, Juvenile Law Center : 1) reviewed statutes in all 50 states and the District of Columbia to assess the legal framework for financial obligations placed on youth in the juvenile justice system and their families; 2) conducted a national survey of lawyers, other professionals, adults with previous juvenile justice involvement, and families to collect information about local practices;¹ 3) interviewed attorneys and young adults who had experiences with the juvenile justice system to further understand how cost of justice issues play out in practice; and 4) solicited a study by criminologists Alex Piquero and Wesley Jennings, who examined the connection between costs and recidivism, and the implications for racial disparities in the juvenile justice system.

As in the criminal justice system, the imposition of costs and fees in the juvenile justice system is widespread across the country. Approximately one million youth appear in juvenile court each year. Costs, fees, fines, or restitution are imposed in every state. **These financial penalties increase recidivism, push impoverished young people deeper into the juvenile justice system, exacerbate racial disparities in the juvenile justice system, and heighten economic and emotional distress for families already struggling financially.**

The chart below identifies the types of financial obligations imposed and the results of our statutory review and stakeholder survey. In some cases, costs are imposed locally even when there is no applicable state statute. In a forthcoming report, we will consider the additional costs that are imposed when indigent youth are required to pay for counsel.

¹ We received responses from 183 individuals in 41 states; in each of these states, respondents reported the imposition of costs, fines, fees or restitution, and harms to youth or families as a result.

NATIONAL OVERVIEW OF COSTS IMPOSED		
TYPE OF COST	STATES WITH A STATUTE AUTHORIZING OR REQUIRING THE COST	STATES WITH PRACTICE OF IMPOSING COSTS (BASED ON SURVEY RESULTS FROM 41 STATES)
Court costs	25	28
Evaluation and Testing	32	26
Probation and Supervision	21	18
Diversion	22	26
Cost of Care	47	31
Fines	43	29
Expungement	11	20
Restitution	50+DC	All

The inability to pay costs, fines, fees, or restitution often results in harsh legal consequences and contributes to financial stress and family tension. In the 41 states with survey respondents, participants widely affirmed that youth experience these consequences for failure to pay:

- Case remained open longer (33 states²)
- Youth was sent to juvenile justice placement (26 states)
- Youth remained in juvenile placement longer than he/she otherwise would have (26 states)
- Additional court visits, leading to missed school or missed work (34 states)
- Inability to get records expunged (24 states)
- Civil judgment imposed (25 states)
- Formal petition filed for failure to pay diversion costs (15 states)

Additionally, respondents in 31 states reported that families took on debt in order to pay their juvenile justice-related financial obligations.

² For each consequence, at least one survey respondent in this many states reported the designated consequence. More often, numerous respondents in each state reported the designated consequence.

Our statutory research also revealed significant consequences that we had not posed as survey questions, but which we believe are also widely imposed and require further study. These include:

- Probation extended
- Probation revoked
- Driver's license revoked, suspended, or child barred from applying for license
- Arrest warrants issued
- Child deprived of needed treatment
- Youth or parents held in civil or criminal contempt
- Interest fees, collection fees, or other additional fees or fines for failure to pay

Until now, almost no empirical research has investigated the effect of financial costs imposed on juvenile offenders and the extent to which such costs contribute to recidivism or their potential impact on racial disparities in the juvenile justice system. Criminologists Alex Piquero and Wesley Jennings used data from a cohort of 1,167 adolescent offenders in Allegheny County, Pennsylvania to examine 1) how demographics and case characteristics relate to financial penalties imposed by the justice system and 2) the degree to which such monetary penalties are related to recidivism in a two-year follow-up.

Their analysis showed that financial penalties in general—and the sheer amount of financial penalties in particular—significantly increased the likelihood of recidivism, even after controlling for relevant demographics and case characteristics. They also concluded that owing costs upon case closing is significantly related to recidivism. Their analysis suggests that cost and fee policies may contribute to racial disparities in the juvenile justice system as children of color are more likely to owe costs upon case closing relative to their white peers. Moreover, 94% of youth in their sample—over 1,000 youth in just one county—owed costs, fines, fees, or restitution.

While this report focuses on a problem—the imposition of costs on youth and families who cannot afford to pay—it also highlights solutions and identifies jurisdictions that are changing their local or state policies to ensure that the youth are not punished for poverty.

MAKING FAMILIES PAY

THE HARMFUL, UNLAWFUL, AND COSTLY PRACTICE OF
CHARGING JUVENILE ADMINISTRATIVE FEES IN CALIFORNIA



MARCH 2017

BerkeleyLaw
UNIVERSITY OF CALIFORNIA

Policy Advocacy Clinic

EXECUTIVE SUMMARY

IN THE WAKE OF TRAGEDIES in cities like Ferguson, Missouri, national attention is focused on the regressive and racially discriminatory practice of charging fines and fees to people in the criminal justice system. People of color are overrepresented at every stage in the criminal justice system, even when controlling for alleged criminal behavior. Racially disproportionate treatment in the system leaves people of color with significantly more criminal justice debt, including burdensome administrative fees.

While regressive and discriminatory criminal justice fees have been described and critiqued in the adult system, the issue has received very little attention in the juvenile system. Nevertheless, families with youth in the juvenile system are charged similar fees, which significantly undermine the system's rehabilitative goals. The harmful practice of charging poor people for their interaction with the criminal justice system is not limited to places like Ferguson, Missouri. California, too, makes families pay for their children's involvement in the juvenile system.

This report presents findings about the practice of assessing and collecting administrative fees from families with youth in the California juvenile system. We use the term "administrative fees" to describe the charges imposed by local jurisdictions on families for their child's involvement in the juvenile system. State law permits counties to charge administrative fees for legal representation, detention, and probation, but only to families with the ability to pay. Most counties in California charge these administrative fees, imposing millions of dollars of debt on families with youth in the juvenile system.

Our research over the last three years reveals that juvenile administrative fees undermine the rehabilitative purpose of the juvenile system. Counties charge these fees to families already struggling to maintain economic and social stability. Fee debt becomes a civil judgment upon assessment. If families do not pay the fees, counties refer the debt to the state Franchise Tax Board, which garnishes parents' wages and intercepts their tax refunds. Under state law, these fees are meant to help protect the fiscal integrity of counties. They are not supposed to be retributive (to punish the family), rehabilitative (to help the youth) or restorative (to repay victims).

This report details our findings on juvenile fees in California, but we summarize them here:

HARMFUL: Juvenile administrative fees cause financial hardship to families, weaken family ties, and undermine family reunification. Because Black and Latino youth are overrepresented and overpunished relative to White youth in the juvenile system, families of color bear a disproportionate burden of the fees. Criminologists recently found that juvenile debt correlates with a greater likelihood of recidi-

vism, even after controlling for case characteristics and youth demographics. These negative outcomes from fees undermine the rehabilitative purpose of the juvenile system.

UNLAWFUL: Some counties charge juvenile administrative fees to families in violation of state law, including fees that are not authorized in the juvenile setting, fees that exceed statutory maximums, and fees for youth who are found not guilty. Some counties violate federal law by charging families to feed their children while seeking reimbursement for the same meals from national breakfast and lunch programs. Further, counties engage in fee practices that may violate the state Constitution by depriving families of due process of law through inadequate ability to pay determinations and by denying families equal protection of the law in charging certain fees.

COSTLY: Counties are authorized to charge families for juvenile administrative fees to pay for the care and supervision of their children. Yet counties net little revenue from the fees. Because of the high costs and low returns associated with trying to collect fees from low-income families, most of the fee revenue pays for collection activities, not for the care and supervision of youth. Further, the fee debt can cause families to spend less on positive social goods, such as education and preventative health-care, which imposes long term costs on families, communities, and society by prolonging and exacerbating poverty.

Based on our findings, fixing the system is not an option. Charging administrative fees to families with youth in the juvenile system does not serve rehabilitative purposes. Other mechanisms in the system punish youth for their mistakes and address the needs of victims. Further, we did not find a single county in which fee practices were both fair and cost-effective. Counties either improperly charge low-income families and net little revenue, or they fairly assess families' inability to pay and net even less. Counties that have recently considered the overall harm, lawfulness, and costs of juvenile administrative fees have all ended the practice.

In light of our findings, we make the following recommendations to policymakers:

RECOMMENDATIONS

1. To end their harmful impact on youth and families, the state should repeal laws that permit the assessment and collection of juvenile administrative fees.
2. To redress unlawful practices, counties should reimburse families for all payments they made on improperly charged juvenile administrative fees.
3. To understand the consequences of costly practices like juvenile administrative fees, the state and counties should collect and maintain better data in the juvenile system.

Research Note: Justice System–Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders

Alex R. Piquero¹ and Wesley G. Jennings²

Abstract

Although the use of financial penalties is pervasive in the justice system, there has been limited (and mostly dated) empirical research that has investigated the effect of financial costs incurred by juvenile offenders and the extent to which such costs relate to the likelihood of recidivism and reintegration into society. This study uses data from a large cohort of adolescent offenders to examine how demographics and case characteristics relate to financial penalties imposed by the justice system and the degree to which such monetary penalties are related to recidivism in a 2-year follow-up. Results suggest that financial penalties increase the likelihood of recidivism. Study limitations and directions for future research are also discussed.

Keywords

juveniles, delinquency, recidivism, restitution, costs, fines, fees

There are a wide range of criminal punishments available to judges and juries when it comes to sanctioning an offender for their transgression(s), the most common of which is probation, with other options including imprisonment and other community correction alternatives (boot camps, intensive supervision, etc.; see Morris & Tonry, 1990). One type of punishment that is also used is that of a fine, a punishment that has been around for several centuries (e.g., Beccaria, 1764/1986; Ruback & Bergstrom, 2006). One would suspect, then, that knowledge about the effect of fines on subsequent reoffending, or recidivism, would be as commonplace as are recidivism-based investigations for the more widely used punishments. Unfortunately, with a few exceptions (Albrecht & Johnson, 1980; Glaser & Gordon, 1988; MacDonald, Greene, & Worzella, 1992) that is not the case, as much of the research surrounding fines has been administrative or process based (cf. Hillsman,

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RESOLUTION ADDRESSING FINES, FEES, AND COSTS IN JUVENILE COURTS

WHEREAS, NCJFCJ recognizes that each child under court jurisdiction is unique, valued and entitled to individualized attention; and

WHEREAS, juvenile and family court judges are responsible for ensuring the safety and well-being of children under court jurisdiction while holding them accountable in developmentally appropriate ways; and

WHEREAS, several hundred thousand delinquency cases are handled by juvenile and family courts annually; and

WHEREAS, juvenile and family court judges routinely impose financial obligations on youth and their families for court-related activities including appointment of counsel fees, bail, diversion and treatment program fees, community supervision and placement fees, court costs, and restitution, frequently without consideration for each individual youth's ability to pay; and

WHEREAS, the court's financial gains as a result of the collection of fines, fees, and costs are often diminished when accounting for the administrative costs associated with collection efforts; and

WHEREAS, the failure to pay can result in serious and long-term consequences for youth and families including further penetration into the juvenile justice system, increased recidivism, difficulty engaging in education and employment opportunities, civil judgements resulting in wage garnishments, exacerbation of existing racial and ethnic disparities and increased financial burdens for impoverished families, all for reasons unrelated to public safety and counterproductive to the rehabilitative aims of the juvenile court; and

WHEREAS, impoverished youth and families may face harsher consequences than their affluent peers because of their inability to pay; and

WHEREAS, numerous professional organizations including the American Bar Association, National Juvenile Defender Center, the Juvenile Law Center, and Conference of Chief Justices/Conference of State Court Administrators have recognized the negative consequences of imposing fines and fees without regard for one's ability to pay and issued guidance on the imposition of juvenile justice related fines, fees, and costs; and

WHEREAS, a growing number of state and local jurisdictions have reduced or eliminated various fines, fees, or costs in consideration of the impact of these financial burdens on youth and families; and

WHEREAS, juvenile and family court judges are uniquely positioned to reduce or eliminate the hardships associated with fines, fees, and costs; and

NOW, THEREFORE, BE IT RESOLVED:

The NCJFCJ recognizes the critical role of the judge and judicial leadership as it applies to the imposition of juvenile court fines, fees, and costs.

The NCJFCJ encourages courts to work towards reducing and eliminating fines, fees, and costs by considering a youth and their family's ability to pay prior to imposing such financial obligations.

The NCJFCJ believes that the core functions necessary for our nation's juvenile courts to meet their rehabilitative goals should be fully funded by governmental revenue and not by revenue generated by fines, fees, and costs. Revenue generated from fines, fees, and costs should never be used for salaries or benefits of official judicial branch employees or operations nor should the revenue be used to evaluate the performance of such employees.

The NCJFCJ encourages courts to presume youth indigent when making decisions regarding the imposition of fines, fees, and costs if the youth was previously determined indigent for the purpose of securing attorney representation.

The NCJFCJ recommends that no court should detain or order youth to out-of-home placement or extend community supervision solely because of lack of payment of fines, fees, or costs.

The NCJFCJ recognizes that court fines, fees, and costs may have a disproportionate impact on poor communities and racial or ethnic minorities and supports the adoption of court policies and practices that promote fairness and equal treatment for all youth and their families.

The NCJFCJ recommends juvenile and family courts collect detailed data on the imposition and collection of fines, fees, and costs, study their effects on youth, families, and courts and demonstrate transparency by making data publicly available.

The NCJFCJ supports the imposition of reasonable restitution after considering a youth's ability to pay and encourages courts to provide opportunities for youth to repay restitution through meaningful community service.

The NCJFCJ supports the use of payment plans in those cases in which fines, costs, or fees are levied.

The NCJFCJ supports continued education for judges and court staff related to constitutional, legal and procedural principles of imposing fines, fees, and costs on youth and their families.



References

- Feierman, J., Goldstein, N., Haney-Caron, E., and Fairfax Columbo, J. (2016). *DEBTORS' PRISON FOR KIDS? The High Cost of Fines and Fees in the Juvenile Justice System*. Juvenile Law Center. Philadelphia, PA. Available
http://jlc.org/sites/default/files/publication_pdfs/JLC_debtorsPrison_9-6v2.pdf
- National Juvenile Defender Center. (forthcoming). *Abolishing the Criminalization of Poverty on Young People: Bail, Fees, Fines, Costs and Restitution in Juvenile Court*
- National Task Force on Fines, Fees and Bail Practices (2017). *Principles on Fines, Fees, and Bail Practices*. Available
<http://www.ncsc.org/~media/Files/PDF/Topics/Fines%20and%20Fees/Principles-Fines-Fees.ashx>
- OJJDP Statistical Briefing Book. Online. Available:
<http://www.ojjdp.gov/ojstatbb/court/qa06201.asp?qaDate=2014>. Released on March 27, 2017.
- Piquero, Alex and Jennings, Wesley. (2017). *Research Note: Justice System-Imposed Financial Penalties Increase the Likelihood of Recidivism in a Sample of Adolescent Offenders*. Youth Violence and Juvenile Justice. Vol. 15(3) 325-340.