



# CHILDHOOD CONVICTED

**THE WAIVER OF IOWA'S  
YOUTH TO THE ADULT  
CRIMINAL JUSTICE SYSTEM**



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## CAMPAIGN FOR YOUTH JUSTICE



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The Campaign for Youth Justice (CFYJ) is a national initiative focused on the removal of youth under 18 from the adult criminal justice system. The Campaign works with youth, families, legislators and system stakeholders to create more developmentally appropriate ways to hold youth accountable for their actions while eliminating the harms associated with exposure to adult courts, jails, and prisons.

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## THE COMMUNITY EMPOWERMENT PROJECT (CELP)



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The CELP, through the representation of nonprofit organizations and other entities, works to strengthen communities, create economic opportunity, and advance social justice in the State of Iowa. We aim to help clients and communities amplify their voices, increase their impact, build strategic alliances, and to engage lawyers as collaborative partners and fellow problem-solvers. The CELP undertakes matters ranging from entity formation and strategic planning to coalition building and the design of advocacy plans.

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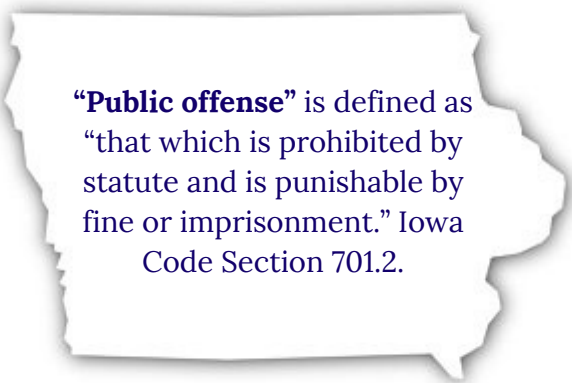
## Executive Summary

**“Being charged as an adult ... I do not want anyone to go through that. I had to fight to be charged as a juvenile,” explained John D., a youth who was sent to an adult jail for a crime he allegedly committed a week before his 16th birthday.<sup>1</sup>**

John D. spent multiple weeks moving between three different adult jails in Iowa—Benton County Jail, Jones County Jail, and Scott County Jail. He described the recreation room in one of the jails as a bigger cell with nothing except for a tennis ball to entertain him. His high school education completely stopped in adult jail.<sup>2</sup> His judge set bond at \$450,000, and his grandma—his primary caregiver—could not afford to pay the bond. Her only income was from a Social Security check.

Unfortunately, John D. is not alone. Under Iowa law, youth as young as 10-years-old can be prosecuted in adult court as youthful offenders and youth as young as 14 may be prosecuted, sentenced, and incarcerated as an adult for any public offense. According to data from the Division of Criminal & Juvenile Justice Planning in Iowa, there were over 12,000 convictions in adult court of youth ages 15 to 17-years-old in 2017.<sup>3</sup> Most of these youth were excluded from juvenile court for simple misdemeanor offenses under Iowa Code Section 232.8.

This brief will cover how youth are currently waived or automatically excluded from the juvenile system, and instead placed in adult courts, jails, and prisons. While in the adult system, these youth struggle to obtain the education, treatment, and resources they need to be successful adults, and upon release are marked with an adult conviction.



**“Public offense”** is defined as “that which is prohibited by statute and is punishable by fine or imprisonment.” Iowa Code Section 701.2.

“All public offenses which are not felonies are misdemeanors. Misdemeanors are aggravated misdemeanors, serious misdemeanors, or simple misdemeanors. Where an act is declared to be a public offense, crime or misdemeanor, but no other designation is given, such act shall be a **simple misdemeanor**.” Iowa Code Section 701.8

“Violations by a child of provisions of chapter 321, 321G, 321I, 453A, 461A, 461B, 462A, 481A, 481B, 483A, 484A, or 484B, which would be **simple misdemeanors** if committed by an adult, and violations by a child of county or municipal curfew or traffic ordinances, **are excluded from the jurisdiction of the juvenile court and shall be prosecuted as simple misdemeanors** as provided by law” Iowa Code Section 232.8 (b)

To put Iowa's youth on the path to productivity instead of adult court and prison, we recommend four policy changes:

**1. Collect, analyze and publish data on all youth in adult courts, jails, and prisons. Include information on their age, gender, race, county, offense, sentence, length of stay in jail, and the services they receive while in adult facilities.**

**2. Limit the types of offenses that may result in transfer from "any public offense" to specific offenses involving public safety concerns.**

**3. End the statutory exclusion of youth from juvenile court. Allow juvenile court judges to decide whether a youth should be transferred to adult court.**

**4. End the pre-trial incarceration of youth under 18 in adult jails.**



Photograph by William Stitt

# Iowa's Waiver Laws

## Discretionary Waiver

Iowa Code § 232.45 gives juvenile court judges discretion to waive youth to adult court. Under the discretionary waiver statute, a youth must be at least 14-years-old and must be accused of a “public offense.”<sup>4</sup> In addition, the prosecutor must file a motion for a discretionary waiver with the juvenile court within ten days of filing the juvenile’s charges.<sup>5</sup>

The juvenile court then holds a waiver hearing, where the judge can decide whether the youth stays in juvenile court. To waive the youth to adult court, the judge must find:

- (1) the child is 14 or older,**
- (2) probable cause to believe the child committed a public offense and**
- (3) that the State has established that there are no reasonable prospects for rehabilitation within the juvenile court system and that waiver would be in the best interests of the child and the community.<sup>6</sup>**



**197 Youth Cases Sent to Adult Court  
by Discretionary Waiver**

When making the "best interest" determination, juvenile courts consider the age of the youth, the severity of the offense, delinquency history, and the juvenile justice services available to the youth.<sup>7</sup> In addition, the juvenile court officer will submit a report recommending or advising against waiver of the youth.<sup>8</sup>

In 2017, 197 cases were transferred by juvenile court judges to adult court in Iowa.<sup>9</sup> Cases transferred to adult court were 5.6% of all of the cases involving a petition or charge filed against youth in juvenile court.<sup>10</sup> It is important to note that these numbers do not include youth statutorily excluded from juvenile court.

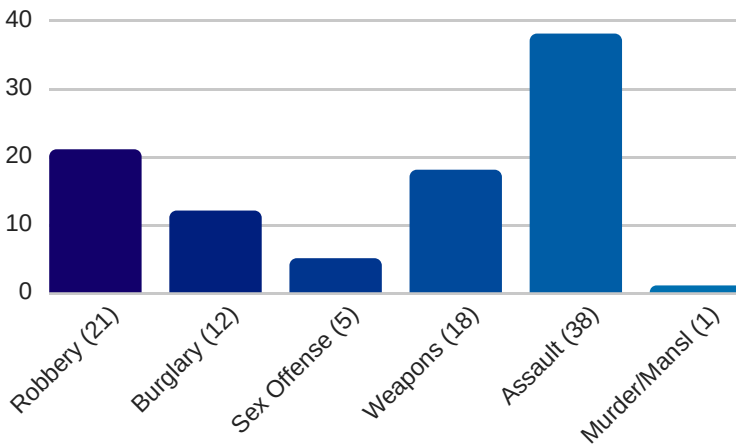
## Statutory Exclusion

In 1996, the Iowa Legislature created statutory exclusions from juvenile court which resulted in youth being automatically sent to adult court.<sup>11</sup> Under Section 232.8(1)(b), youth are automatically excluded from juvenile court if they commit one of the violations listed in the subsection that “would be [a] simple misdemeanor[] if committed by an adult.”<sup>12</sup> Examples of such violations include operation of a car or boat without a license and the sale of tobacco to minors.<sup>13</sup>

In 2017, there were 12,326 convictions of youth ages 15-17 in adult courts, mostly for simple misdemeanors involving traffic violations (11,054 convictions) and tobacco violations (703 convictions).<sup>14</sup> In addition to the simple misdemeanors outlined in 232.8(1)(b), youth may also be automatically excluded on more serious offenses.

Under 232.8(1)(c), youth are automatically sent to adult court if they are at least 16-years-old and are charged with one of the following:

- (1) a forcible felony;**
- (2) manufacturing, delivering, or possessing controlled substances with intent to deliver, while in the immediate possession or control of a firearm or offensive weapon; or**
- (3) felony-grade weapons violations, or any weapons violation committed by a criminal street gang member for the benefit of, at the direction of, or in association with a criminal street gang.**



**2017 Convictions of 15-17-Year-Olds in Adult Court**

Youth who are automatically excluded from juvenile court under 232.8(1)(c) can file a motion and request to be sent to juvenile court, a process often referred to as “reverse waiver.”<sup>15</sup> The youth’s attorney must file this motion within ten days of the petition or waiver determination, and the adult court considers the same factors—i.e., the seriousness of the offense, the prior history of the juvenile, the juvenile’s age, the juvenile court officer’s recommendation, etc.—that a juvenile court considers during a discretionary waiver hearing in determining whether to send the youth to juvenile court.<sup>16</sup>

## **Once An Adult Always An Adult**

In addition, under Iowa Code Section 232.45A(2), “[o]nce a child sixteen years of age or older has been waived by the juvenile court to the district court, all subsequent criminal proceedings against the child for any delinquent act committed after the date of the waiver by the juvenile court shall begin in district court.”<sup>17</sup> Therefore after a youth has been waived to adult court all future encounters with the legal system will be in adult court, no matter how minor the subsequent offense.

## **Youthful Offender Statute**

In Iowa, youth between the ages of 10 and 15-years-old can be prosecuted in adult court as youthful offenders.<sup>18</sup> After the prosecutor files the initial juvenile delinquency petition, either party—the prosecutor or the juvenile—can motion for youthful offender status under Iowa Code § 232.45(1) and 907.3A.<sup>19</sup> When considering whether to prosecute a child as a “youthful offender” the trial court considers whether the child is age 12-15 or age 10 or 11 and charged with a Class “A” felony if committed by an adult. They also consider whether there is probable cause to believe the child has committed a public offense that would get a 16 or 17-year-old excluded from juvenile court, and whether the state has established that the youth could not be rehabilitated prior to their 18th birthday if the juvenile court retained jurisdiction.<sup>20</sup>

If a youth is granted youthful offender status, the district court will hold a hearing prior to their 18th birthday to determine what will happen once the youth turns 18. At this hearing, the district court judge can “[d]efer judgment and place the youthful offender on probation, upon consent of the youthful offender,” “[d]efer the sentence and place the youthful offender on probation,” “[s]uspend the sentence and place the youthful offender on probation,” order “[a] term of confinement as prescribed by law for the offense,” or “[d]ischarge the youthful offender from youthful offender status and terminate the sentence.”<sup>21</sup>

If the youth is granted youthful offender status, he or she will have access to juvenile services in a juvenile facility.<sup>22</sup> If the youth does well in the juvenile facility, the youth will not have a conviction on his or her record and will not experience the negative collateral consequences that accompany a conviction.<sup>23</sup> However, if the youth has trouble in the juvenile facility, he or she could receive an adult sentence and conviction. Youthful offender status is not used very often in Iowa. From 2013 to 2017, only 22 youth participated in the youthful offender program.<sup>24</sup>

# Impact of Adult Court Convictions

## Collateral Consequences

According to the Council of State Government's National Collateral Consequence Database, there are 110 mandatory consequences associated with felony convictions in Iowa and 31 associated with certain misdemeanor convictions.<sup>25</sup> These collateral consequences could negatively impact the employment, education, and housing of youth, thereby impacting their ability to be successful, employed, contributors to their community.

The number of youth with adult court convictions has increased from 2013 from 10,908 to 12,326 in 2017.<sup>26</sup> However, most of the increase is for traffic, tobacco, natural resource, and alcohol offenses. In 2017, 47 youth ended up on adult probation following their conviction and 13 youth were sent to adult prison.<sup>27</sup> The low number of youth who end up on adult probation and in adult prison compared to the number of adult court convictions raises a question. Why are so many youth transferred to adult court and marked with the collateral consequences of an adult court conviction, if they are later determined to be appropriately served by the juvenile justice system or in the community under adult supervision?

The data suggest that it would be more appropriate to start and retain an overwhelming majority of youth in juvenile court rather than excluding hundreds of youth from juvenile court who end up either being reverse waived from adult court to juvenile court or receiving sanctions that could be administered by the juvenile justice system. In addition, the harmful collateral consequences of an adult court conviction have a disproportionate impact on Black youth in Iowa.

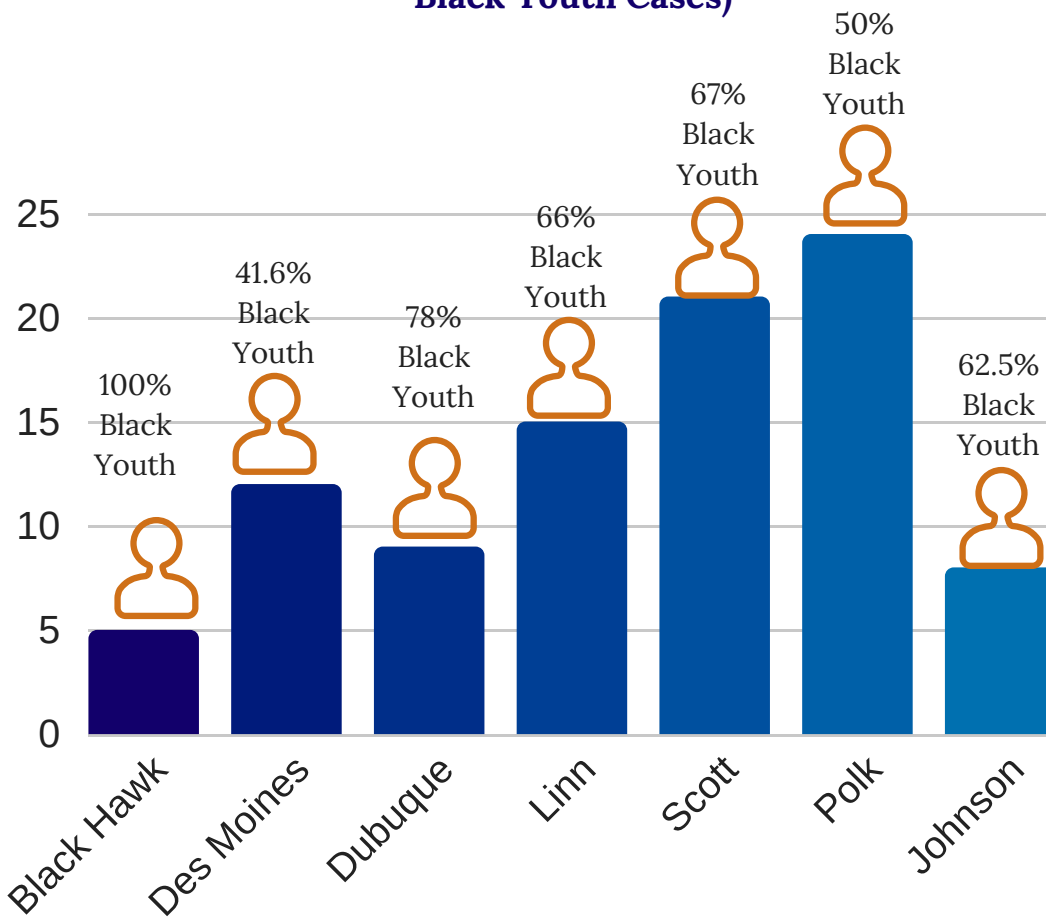
## Racial Disproportionality

In Iowa, the Division of Criminal & Juvenile Justice Planning within the Department of Human Rights collects data on discretionary waiver of youth to adult court by juvenile court judges as well as the reverse waiver of youth from adult district court.

According to their data, Black youth were disproportionately impacted by waivers compared to their peers of other races. In 2017, Black youth made up 6 percent of the youth at risk of touching the juvenile justice system (youth ages 10-17) in Iowa.<sup>28</sup> In the same year, Black youth were 35.7% of the cases petitioned in juvenile court, 37% of the cases resulting in secure confinement in a juvenile correctional facility, and 34% of the cases of youth transferred to adult court by a juvenile court judge.<sup>29</sup>



## Number of Discretionary Waiver Cases By County (Percentage of Black Youth Cases)



Disproportionate minority contact in the juvenile justice system, and particularly at the point of transfer to adult court, affects some Iowa communities more than others.<sup>30</sup> In 2017, 24 youth were waived from juvenile court to adult court in Polk County.<sup>31</sup> While black youth are 10.5% of the 10-17-year olds in Polk County, they are 50% of the youth waived to adult court. Similarly, in Scott County, Iowa, in 2017, Black youth were approximately 13% of the total 10-17-year-old population, but approximately 67% of the youth waived to adult court.<sup>32</sup> While these communities have the highest number of total transfers, a number of communities disproportionately transfer Black youth to adult court. As a result, Black youth are more likely to experience not only adult court, but also adult jails pre-trial.

## Youth Held in Adult Jails

There is overwhelming national data that shows holding youth in adult jails is dangerous and traumatic for youth. Youth under 18 held in adult jails are 9 to 36 times more likely to commit suicide than their peers in the community and in juvenile facilities, respectively, and 5 times more likely to experience abuse than their peers in juvenile facilities.<sup>33</sup> As a result, the Centers for Disease Control Task Force on Community Preventative Services highlighted in their report that youth transferred to the adult system are at least 34 percent more likely to be re-arrested for violent offenses.<sup>34</sup>

In Iowa, youth may be held in adult jails. Under Section 238.22, youth waived to adult court do not receive the same considerations of youth held in adult jails on juvenile charges. Currently the statute states:

5(b) The restrictions contained in this subsection relating to the detention of a child in a facility under subsection 3, paragraph “c”, **do not apply if the court has waived its jurisdiction over the child for the alleged commission of a felony offense pursuant to section 232.45.**

7. If the court has waived its jurisdiction over the child for the alleged commission of a forcible felony offense pursuant to section 232.45 or 232.45A, and there is a serious risk that the child may commit an act which would inflict serious bodily harm on another person, the child may be held in the county jail, notwithstanding section 356.3. However, wherever possible the child shall be held in sight and sound separation from adult offenders. A child held in the county jail under this subsection shall have all the rights of adult post-arrest or pretrial detainees.

The statute does not state who makes the decision to hold a youth in a county jail versus a juvenile detention center. While it does require the potential serious risk of serious bodily harm, there are no guidelines on how one determines what constitutes a “serious risk.” Is it enough for a youth to be charged with assaultive behavior?

While sight and sound separation for youth from adults in adult jails is meant to protect youth, the unintended consequence of this protection is often solitary confinement for youth. Unfortunately, solitary confinement is just as harmful and traumatic for youth. In 2011, the UN Special Rapporteur on Torture, Juan E. Mendez, found that the use of prolonged solitary confinement on youth is torture and should not be used on youth or those with mental illnesses.<sup>35</sup>

There are a number of risks associated with the placement of youth in adult facilities. Given that an overwhelming majority of youth with adult court convictions are convicted of low-level offenses, and only very few, 13 youth in 2017, end up committed to adult prisons,<sup>36</sup> placement of youth in adult jails before they have been convicted of any offense is an unnecessary trauma to the youth and safety liability for the facility.

# Recommendations

**1. Collect, analyze and publish data on all youth in adult courts, jails, and prisons. Include information on their age, gender, race, county, offense, sentence, length of stay in jail, and the services they receive while in adult facilities.**

Currently, Iowa publishes data on the number of youth transferred to adult court by juvenile court judges by race, gender, and locality. While this information is critical, it is an incomplete picture of the impact of Iowa's waiver laws on youth. There should be data collected, analyzed, and published on all youth transferred or statutorily excluded from juvenile court by their age, race, offense, and county. There should also be data on the outcomes of those cases, specifically, whether or not youth are reverse waived to juvenile court, convicted in adult court, adjudicated a youthful offender, or have their cases dismissed. There is currently some data on how many youth end up on adult probation or in adult prison by offense, but there is not much data on youth who end up in adult jail pre-trial, the length of their stay there, or the level of education or treatment services that they receive in the jail.

To best understand the impact of treating youth in the juvenile system versus the adult system, the legislature should ensure that the Criminal and Juvenile Justice Planning Division have the resources and capacity to work with different agencies to track this data along with recidivism rates by outcome. These data points are critical to understanding the full, long-term impact of the waiver laws not only on youth, but also on their communities.

**2. Limit the types of offenses that may result in transfer for “any public offense” to specific offenses involving public safety concerns.**

Iowa law permits the transfer of youth age 14 and older for any public offense, including misdemeanors or non-violent offenses. Given the collateral consequences and harms associated with youth in the adult criminal justice system, transfer to adult court should be reserved solely for the most serious cases, and only after a juvenile court judge reviews the facts of the case, the individual needs of the youth, and opportunities for rehabilitation in the juvenile justice system. Transfer should be rare and individualized with the recognition that the adult system, by design, is not a place for youth.

### **3. End the statutory exclusion of youth from juvenile court. Allow juvenile court judges to decide whether a youth should be transferred to adult court.**

Researchers, psychologists, and justices of the Iowa Supreme Court and the United States Supreme Court have recognized that youth are different from adults, and therefore their age and amenability to rehabilitation should be taken into consideration.<sup>37</sup> Statutory exclusion of youth from juvenile court does not allow a juvenile court judge to consider the individual needs of a youth before they are given a public adult record. The Iowa Legislature should consider amending code Sections 232.8 to eliminate the statutory exclusion of youth for specific simple misdemeanors and 16 and 17-year-olds for the offenses outlined in Section 232.8(1)(c) of the statute. Research shows that statutory exclusion is the least effective in terms of judicial economy and selecting youth who will actually end up requiring the deepest end of the adult system.<sup>38</sup> Allowing all youth to start in juvenile court, and to have a hearing on their individual needs before being exposed to the collateral consequences of the adult system will reduce the harm and costs associated with statutory exclusion.

### **4. End the pre-trial incarceration of youth under 18 in adult jails.**

As stated previously, youth held in jails pre-trial are at a greater risk of harmful outcomes. The Iowa Legislature should amend Section 232.22 (5)(b) to end the pre-trial incarceration of youth waived to adult court in adult jails. In addition to increasing access to family support and educational services, if youth are in juvenile settings, the burden associated with keeping youth sight and sound separated in adult jails will be eliminated. Under state law and the federal Prison Rape Elimination Act, youth must be held sight and sound separate, and jails that are unable to keep youth safe are at risk of litigation if a youth is harmed.<sup>39</sup> Adult jails were not created to hold youth and the use of these facilities to do so is potentially harmful. The Iowa Legislature should ban the placement of youth under 18 in adult jails pre-trial.

## **Conclusion**

Over the past decade, a number of states have passed laws to move youth out of adult courts, jails, and prisons.<sup>40</sup> With over 12,000 adult court convictions, Iowa has an opportunity to change the trajectory of thousands of youth by collecting in depth data on how youth are treated in the adult system, by limiting the types of offenses eligible for transfer, ending statutory exclusion, and keeping youth under 18 out of adult jails pre-trial. Iowa's legislators can champion the future of its youth and strengthen public safety by keeping youth out of the adult system and providing youth with developmentally appropriate, evidence-based interventions.

## Endnotes

<sup>1</sup> For confidentiality purposes, the name of this interviewee has been changed to John D. This is a quote from his interview with the CELP team.

<sup>2</sup> *Id.*

<sup>3</sup> Email from Kathy Nesteby, Executive Officer of the Division of Criminal and Juvenile Justice Planning, to Jeree Thomas, Policy Director, Campaign for Youth Justice, (January 28, 2018, 10:13 CST) (on file with author).

<sup>4</sup> Iowa Code § 701.2 defines a “public offense” as “that which is prohibited by statute and is punishable by fine or imprisonment.”

<sup>5</sup> Iowa R. Juv. Pro. 8.9.

<sup>6</sup> Iowa Code § 232.45.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> Division of Criminal and Juvenile Justice Planning, *DMC State Matrices- 2017*. (2018), <https://humanrights.iowa.gov/sites/default/files/media/CY2017%20DMC%20Matrices%20-%20Statewide.pdf>

<sup>10</sup> *Id.*

<sup>11</sup> Scott Musel, *Juvenile Crime and the Welfare of Youth*, Division of Criminal and Juvenile Justice Planning 7, (1999). <http://publications.iowa.gov/1527/1/JuvenileRpt99.pdf>

<sup>12</sup> This subsection applies only to specific violations listed in the statute. These violations are found in Chapters 321 (Motor Vehicles and Law of the Road), 321G (Snowmobiles), 321I (All-Terrain Vehicles), 453A (Cigarette and Tobacco Taxes and Regulation of Alternative Nicotine Products and Vapor Products), 461A (public lands and waters), 461B (Use of Waters by Nonresidents), 462A (Water Navigation Regulations), 481A (Wildlife Conservation), 481B (Endangered Plants and Wildlife), 483A (Fishing and Hunting Licenses, Contraband, and Guns), 484A (Migratory Game Birds), and 484B (Hunting Preserves).

<sup>13</sup> See Iowa Code Chapter 453A (Cigarette and Tobacco Taxes and Regulation of Alternative Nicotine Products and Vapor Products); Iowa Code Chapter 321 (Motor Vehicles and Law of the Road); Iowa Code Chapter 461A (public lands and waters).

<sup>14</sup> Nesteby, *supra* note 3.

<sup>15</sup> Iowa Code § 232.8 (1)(c), Iowa Code § 803.6

<sup>16</sup> Iowa Code § 803.6

<sup>17</sup> Iowa Code § 232.45A

<sup>18</sup> Iowa Code § 232.45 (7)(a) and Iowa Code § 907.3A.

<sup>19</sup> Iowa Code § 232.45(1)

<sup>20</sup> Iowa Code § 907.3A.

<sup>21</sup> *Id.* § 907.3A(3)(a)(1–5).

<sup>22</sup> *Id.* § 907.3A

<sup>23</sup> *Id.*

<sup>24</sup> *Id.*

<sup>25</sup> The Council of State Governments Justice Center. *National Inventory of the Collateral Consequences of Conviction*. (2018). <https://niccc.csjusticecenter.org/>

<sup>26</sup> Nesteby, *supra* note 3.

## Endnotes

<sup>27</sup> *Id.*

<sup>28</sup> Division of Criminal and Juvenile Justice Planning. *supra* note 9.

<sup>29</sup> *Id.*

<sup>30</sup> Iowa Justice Data Warehouse, *Easy Access to Juvenile Court Data*,

[http://dev.ncjj.org/ojstatbb\\_usp/ezajcd/](http://dev.ncjj.org/ojstatbb_usp/ezajcd/)

<sup>31</sup> Division of Criminal and Juvenile Justice Planning. *DMC Matrices Polk County 2017* (2018). <https://humanrights.iowa.gov/sites/default/files/media/CY2017%20DMC%20Matrices%20-%20Polk.pdf>

<sup>32</sup> Division of Criminal and Juvenile Justice Planning. *DMC Matrices Scott County 2017* (2018). <https://humanrights.iowa.gov/sites/default/files/media/CY2017%20DMC%20Matrices%20-%20Scott.pdf>

<sup>33</sup> Bureau of Justice Statistics. *Mortality in local jails and state prisons, 2000-2013- statistical tables*. 3 Department of Justice. <https://www.bjs.gov/content/pub/pdf/mljsp0013st.pdf>. See National Center for Injury Prevention and Control (2014) *United States Suicide Injury Deaths and Rates per 100,000 (All Races, Both Sexes, Ages 10 to 17)*. Center for Disease Control and Prevention. See Neelum Arya, *Getting to Zero: A 50-State Study of Strategies to Remove Youth from Adult Jails*. (2018).

[https://drive.google.com/file/d/1LLSF8uBlrcqDaFW3ZKo\\_k3xpk\\_DTmItV/view](https://drive.google.com/file/d/1LLSF8uBlrcqDaFW3ZKo_k3xpk_DTmItV/view) See also Prison Rape Elimination Act of 2003 (PREA), 42 U.S.C. §§156016-15609 (2003)

<sup>34</sup> McGowan, A., Hahn, R., Liberman, A., Crosby, A., Fullilove, M., Johnson, R., . . . Stone, G. (2007). *Effects on violence of laws and 9 policies facilitating the transfer of juveniles from the juvenile justice system to the adult justice system*. *American Journal of Preventive Medicine*, 32(4), 7-28. doi:10.1016/j.amepre.2006.12.003

<sup>35</sup> United Nations. (2011, October). *Solitary Confinement Should be banned in most cases*, UN expert says. <https://news.un.org/en/story/2011/10/392012-solitary-confinement-should-be-banned-most-cases-un-expert-says>

<sup>36</sup> Nesteby, *supra* note 3.

<sup>37</sup> National Research Council. *Reforming Juvenile Justice: A Developmental Approach*. National Academies Press (2013), <https://www.nap.edu/catalog/14685/reforming-juvenile-justice-a-developmental-approach> See also *State v. Lyle*, 854 N.W. 2d 378 (Iowa Sup.Ct. 2014).

<sup>38</sup> Steven Zane, *Do Criminal Court Outcomes Vary by Juvenile Transfer Mechanism? A Multi-Jurisdictional, Multilevel Analysis*. *Justice Quarterly*, Vol. 34, Issue 3 (2017).

<sup>39</sup> Neelum Arya, *Getting to Zero: A 50-State Study of Strategies to Remove Youth from Adult Jails*. (2018).

[https://drive.google.com/file/d/1LLSF8uBlrcqDaFW3ZKo\\_k3xpk\\_DTmItV/view](https://drive.google.com/file/d/1LLSF8uBlrcqDaFW3ZKo_k3xpk_DTmItV/view)

<sup>40</sup> Jeree Thomas, *Raising the Bar: State Trends in Keeping Youth Out of Adult Court*. Campaign for Youth Justice, 2018. [http://cfyj.org/images/A-StateTrends\\_Report-Web.pdf](http://cfyj.org/images/A-StateTrends_Report-Web.pdf)



