



August 2, 2010

The Honorable Eric Holder
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: Response to Request for Public Comments, OJP (OJJDP) Docket No. 1524

Dear Attorney General Holder:

On behalf of the Campaign for Youth Justice (CFYJ), I am writing to submit a response to the request for public comments issued by the Coordinating Council on Juvenile Justice and Delinquency Prevention on July 8, 2010. CFYJ is a national non-profit organization working to end the practice of prosecuting youth in adult criminal court and seeking more effective approaches for youth in the juvenile justice system. As you Chair the Coordinating Council, I appreciate your willingness to consider comments from the juvenile justice field while shaping federal policies and practices that affect youth, and hope that we can continue to work together to address juvenile justice issues.

In order for the Coordinating Council to adequately address its four stated priority issues—education and at-risk youth, reentry, racial and ethnic disparities, and tribal youth—it must effectively deal with the issue of the approximately 200,000 youth being processed in adult criminal court each year.¹ Within the United States, each state and the District of Columbia have laws that allow children under the age of 18 to be prosecuted in the adult criminal justice system. These laws have led to an estimated 11,000 youth under the age of 18 being incarcerated in adult facilities on any given day—7,500 in adult jails and an more than 3,600 in adult prisons.²

¹ Woolard, J.L. et al. Coalition for Juvenile Justice. (2005). *Juveniles within Adult Correctional Settings: Legal Pathways and Developmental Considerations*, 4 Int'l J. Forensic Mental Health 18; Coalition for Juvenile Justice. (2005). *Childhood on Trial: The Failure of Trying and Sentencing Youth in Adult Criminal Court*.

² Campaign for Youth Justice. (November 2007). *Jailing Juveniles*; West, H.C. et al. (March 2009). *Bureau of Justice Statistics, Prison Inmates at Midyear 2008*.

Research shows that young people who are kept in the juvenile justice system are less likely to reoffend than youth who are prosecuted in the adult criminal justice system. According to the federal Centers for Disease Control and Prevention, youth who are transferred from the juvenile court system to the adult criminal system are approximately 34% more likely to re-offend than youth retained in the juvenile justice system.³

Although federal law requires that youth in the juvenile justice system be removed from adult jails (except under limited exceptions where they must be sight-and-sound separated from adults), these protections do not apply to youth prosecuted in the adult criminal justice system. Youth who are prosecuted in adult criminal court are at the greatest risk of sexual victimization. The National Prison Rape Elimination Commission found that “more than any other group of incarcerated persons, youth incarcerated with adults are probably at the highest risk for sexual abuse.”⁴ According to research by the Bureau of Justice Statistics (BJS), youth under the age of 18 represented 21% of all substantiated victims of inmate-on-inmate sexual violence in jails in 2005, and 13% in 2006—surprisingly high since only 1% of adult jail inmates are juveniles.⁵ Deborah LaBelle, an attorney working with over 400 youth serving sentences of life without possibility of parole, testified before the National Prison Rape Elimination Commission that 80% of those youth had been sexually assaulted within the first year of their incarceration in adult prisons.⁶

Staff in adult facilities face a dangerous dilemma—they must choose between housing youth in the general adult population where they are at substantial risk of physical and sexual abuse, and housing youth in segregated settings in which isolation can cause or exacerbate mental health problems. If youth are separated from adults, youth are then frequently locked down 23 hours a day in small cells with no natural light, particularly in adult jails. These conditions can cause anxiety, paranoia, and exacerbate existing mental disorders, putting youth at risk of suicide. Youth housed in adult jails are 36 times more likely to commit suicide than are youth housed in juvenile detention facilities.⁷

³ Centers for Disease Control and Prevention. (2007). *Effects on Violence of Laws and Policies Facilitating the Transfer of Youth from the Juvenile to the Adult Justice System: A Report on Recommendations of the Task Force on Community Preventive Services*, available at <http://www.cdc.gov/mmwr/pdf/rr/rr5609.pdf>.

⁴ National Prison Rape Elimination Commission. (June 2009). *National Prison Rape Elimination Commission Report*, available at <http://www.ncjrs.gov/pdffiles1/226680.pdf>.

⁵ Beck, A.J., Harrison, P.M., & Adams, D.B. U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. (August 2007). *Sexual Violence Reported by Correctional Authorities, 2006*; Beck, A. J., Harrison, P.M., Adams, D.B. U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. (August 2007). *Sexual Violence Reported by Correctional Authorities, 2005*.

⁶ Deborah LaBelle, Testimony before the National Prison Rape Elimination Commission, *At Risk: Sexual Abuse and Vulnerable Groups Behind Bars* 33 (Aug. 19, 2005).

⁷ Campaign for Youth Justice. (November 2007). *Jailing Juveniles*.

In light of the research demonstrating the harmful effects to youth and to public safety of trying, sentencing, and incarcerating youth in the adult criminal justice system, I believe that the Coordinating Council cannot begin to conduct an assessment of federal policies and practices that affect youth and their families without addressing this population. We understand that education and support for at-risk youth is a priority for President Obama and other members of his Administration. Youth tried as adults are at-risk youth. These are often the children who have fallen through the cracks and been denied programming and opportunities in the past. They are also disproportionately children of color. Most are charged with non-violent offenses.⁸ Because these youth are tried as adults, they will continue to be denied meaningful opportunities for rehabilitation.

As Secretary Arne Duncan has noted, “The President understands the power of education to change lives.”⁹ This population should be just as entitled to the Administration’s aspirations as other at-risk children. Accordingly, the Coordinating Council cannot genuinely address its priority issues without including youth prosecuted in the adult criminal justice system.

1. Education and At-Risk Youth

Secretary Duncan has observed that “we’re sending 1.2 million kids into the streets each year without an education. It’s economically unsustainable and it’s morally unacceptable.”¹⁰ As multiple agencies tackle this problem, the Coordinating Council must work with the rest of the Administration by addressing the population of youth tried as adults, who make up a substantial portion of these children.

Adult detention and correctional facilities do not have the capacity to provide the necessary education and other programs crucial for the healthy development of adolescents. Even though legally required to, few adult jails provide appropriate education to youth. A Bureau of Justice Statistics (BJS) survey found that 40% of jails provided no educational services at all, only 11% of jails provided special education services, and only 7% provided vocational training.¹¹ As many as one-half of all youth transferred to the adult criminal justice system do not receive adult convictions, and are returned to the juvenile justice system or are not convicted at all.¹² Many of these youth

⁸ Campaign for Youth Justice. (March 2007). *The Consequences Aren’t Minor: the Impact of Trying Youth as Adults and Strategies for Reform*.

⁹ Arne Duncan, *Equity and Education Reform: Secretary Arne Duncan’s Remarks at the Annual Meeting of the National Association for the Advancement of Colored People (NAACP)* (Jul. 14, 2010), available at <http://www.ed.gov/news/speeches/equity-and-education-reform-secretary-arne-duncans-remarks-annual-meeting-naacp>.

¹⁰ *Supra* note 9.

¹¹ Harlow, C.W. U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Statistics. (January 2003). *Education and Correctional Populations*.

¹² Juszkievicz, J. Campaign for Youth Justice. (October 2007). *To Punish A Few: Too Many Youth Caught in the Net of Adult Prosecution*.

will have spent *at least one month* in an adult jail¹³ and one in five of these youth will have spent *over six months* in an adult jail.¹⁴ Without adequate education and other services, jails take youth off course.

Because of their age, most youth in jails have not completed their high school education and need classes to graduate or obtain a GED, or to acquire vocational skills to get a job. Without adequate schooling, too many youth are at risk of falling further and further behind academically even though they are legally entitled to an education. Most states have mandatory attendance laws requiring that children attend school unless they have obtained a diploma or a GED. The federal special education law, the Individuals with Disabilities Education Act (IDEA), also requires jails to provide special education services for qualifying youth; however, jails frequently have difficulty meeting their legal obligations.

For example, at the Madison Street Maricopa County Jail in Arizona, education programs were limited to three hours per day and did not provide an option for obtaining a diploma.¹⁵ The Orange County Grand Jury in California, a citizen oversight commission, found that “the opportunity for rehabilitation and education of juveniles is extremely difficult because there is neither adequate classroom space nor opportunity for minimum classroom instruction time at Central Men’s Jail.”¹⁶ While juvenile detention centers often have full-time education staff, adult jails have weak educational programs and it is rare for jails to have classrooms for education.

Additionally, youth placed in adult prisons also lack adequate educational opportunities. According to the most recent Bureau of Justice Statistics (BJS) survey, almost 2 in 10 state prisons and 4 in 10 private prisons fail to offer even basic education programs, and only 56% of state prisons and 44% of private prisons offer vocational training.¹⁷ Over half of state inmates 24 or younger have not completed the 12th grade or the GED.¹⁸

The educational neglect of youth in adult facilities is not only harmful to youth, but it also has consequences for public safety. In a recent study of the correlation between educational attainment and crime trends, the Justice Policy Institute found that graduation rates were closely associated with positive public safety outcomes. Researchers found that a 5% increase in male high school graduation rates would produce an annual savings

¹³ Ibid. Overall, 52.9% of all juvenile defendants prosecuted in criminal courts were detained. The statistics here are for detained youth.

¹⁴ Ibid.

¹⁵ Garcia, J. State of Arizona, Governor’s Office for Children, Youth, and Families. (October 2007). *Letter to Committee on Education and Labor*, available at http://www.act4jj.org/media/documents//document_22.pdf.

¹⁶ Orange County Grand Jury. (May 2001). *Kids in Adult Lockup: Bad Boys in a Bad Place!*, available at <http://www.ocgrandjury.org/pdfs/GJKidsLockup.pdf>.

¹⁷ Ibid.

¹⁸ Ibid.

of almost \$5 billion in crime-related expenses.¹⁹ Additionally, a study in the *American Economic Review* found that a one-year increase in average years of schooling completed reduces violent crime by almost 30%.²⁰ Making sure that youth do not fall further behind in school is important. Educational attainment, particularly high school graduation, serves as an important benchmark in the process of transitioning to adulthood. Achieving this benchmark has a key “normalizing effect” on the individual.²¹

As various agencies in this Administration are moving forward to provide education and opportunities to at-risk youth, the Coordinating Council must ensure that youth tried as adults are not shortchanged.

2. Juvenile Reentry and Transitions to Adulthood

We understand that this Administration believes in removing barriers to employment and other opportunities for formerly incarcerated people under the Second Chance Act. Youth tried as adults, however, continue to face unique barriers to reentry that youth tried as juveniles do not face. In its analysis of reentry, the Council must consider the thousands of youth reentering the community each year from adult jails and prisons.

Reentry planning is particularly important for youth involved in the adult criminal justice system. First, the majority of youth held in adult prisons are likely to be released in early adulthood. Approximately 80% of youth convicted as adults will be released from prison before their 21st birthday, and 95% will be released before their 25th birthday.²² Second, these youth are more likely to reoffend than their peers in the juvenile justice system.²³ Third, youth in adult jails and prisons typically lack access to even basic age-appropriate programming, such as education and special education services, putting them at a greater disadvantage when they return home. Finally, youth who are involved in the adult criminal justice system face unique barriers to reentering their communities due to their having an adult court charge or conviction. These unique barriers include exclusion from schools and educational programs typically available to youth involved in the juvenile justice system, and being barred from military service, housing, employment, and other opportunities. As such, it is critical that these youth get the services they need to successfully transition back into society.

In order to provide reentering youth with a meaningful opportunity to rejoin society, the Coordinating Council must support comprehensive reentry programming for all juvenile

¹⁹ Justice Policy Institute. (August 2007). *Education and Public Safety*, available at http://www.justicepolicy.org/images/upload/07-08_REP_EducationAndPublicSafety_PS-AC.pdf.

²⁰ Ibid.

²¹ Ibid.

²² Redding, R.E. U.S. Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention. (August 2008). *Juvenile transfer laws: An effective deterrent to delinquency?*.

²³ *Supra* note 3.

offenders, especially for those in the adult criminal justice system, and examine the unique barriers to reentry faced by youth involved with the adult criminal justice system.

3. Racial and Ethnic Disparities in the Juvenile Justice and Related Systems

With regard to racial and ethnic disparities, CFYJ would like to thank the Coordinating Council for recognizing that reducing disparities is an issue of priority for the juvenile justice and adult criminal justice systems as well as for other youth-serving agencies. Over the past two years, CFYJ has published reports on how youth of color are disproportionately affected in the juvenile and criminal justice systems; these reports are available on our website at <http://www.campaignforyouthjustice.com/key-research/policy-briefs.html>.

These reports, along with other research, indicate that youth of color in the juvenile and adult criminal justice systems are treated more harshly than white youth charged with similar offenses. This is the case despite the fact that according to self-report surveys, youth of color do not engage in more delinquent behavior overall than white youth. The reports also indicate that the disparities between white youth and youth of color increase the more involved the youth becomes in the juvenile justice and adult criminal justice systems, such that the transfer of youth to the adult criminal justice system is the most disparate point in the system.

- African-American youth overwhelmingly receive harsher treatment than white youth at most stages of case processing. African-American youth make up 30% of those arrested, although they only represent 17% of the overall youth population. At the other end of the system, African-American youth are 62% of the youth prosecuted in the adult criminal system and are nine times more likely than white youth to receive an adult prison sentence.²⁴
- Compared to white youth, Latino youth are 4% more likely to be petitioned, 16% more likely to be adjudicated delinquent, 28% more likely to be detained, and 41% more likely to receive an out-of-home placement. The most severe disparities occur for Latino youth tried in the adult criminal justice system. Latino children are 43% more likely than white youth to be waived to the adult criminal justice system and 40% more likely to be admitted to adult prison.²⁵

CFYJ recommends that the Coordinating Council take immediate action to address the pervasive racial and ethnic disparities in the juvenile and adult criminal justice systems and minimize the negative impact of transfer laws on youth of color. The Council can do this by providing specific, evidence-backed guidance on how to achieve reductions in racial and ethnic disparities within the juvenile and adult criminal justice systems,

²⁴ Arya, N. & Augarten, I. Campaign for Youth Justice. (September 2008). *Critical Condition: African-American Youth in the Justice System*.

²⁵ Arya, N., Villarruel, F., Villanueva, C., & Augarten, I. Campaign for Youth Justice. (May 2009). *America's Invisible Children: Latino Youth and the Failure of Justice*.

particularly with regard to youth prosecuted as adults. Since transfer to adult court is the most disparate point in the system, the Coordinating Council cannot begin to address the problem of racial and ethnic disparities without taking into account youth in the adult criminal justice system.

4. Tribal Youth and Juvenile Justice

Native American youth are overrepresented in the justice system. Native youth are only 1% of the national population, but 70% of youth committed to the Federal Bureau of Prisons (BOP) as delinquents are Native American youth, as are 31% of youth committed to BOP as adults.²⁶

Most delinquent acts committed by Native American youth are low-level offenses, many involving alcohol.²⁷ Many Native youth receive either no court intervention at all or disproportionately severe sanctions, including out-of-home placements and transfer to the adult criminal justice system, both of which are applied to Native American youth 1.5 times more than to White youth.²⁸

Many factors contribute to this situation, including a lack of cultural competence and inattention to the needs of Native youth in state and federal systems, an over-reliance on incarceration, and a lack of support and resources for tribal justice systems.

To address these problems, the Coordinating Council must ensure that Native youth are provided adequate and appropriate services and, if youth are removed from their homes, that they are placed in safe environments close to their communities. CFYJ advises that the Council strengthen tribal juvenile justice systems, establish relationships between tribes and state and local juvenile justice agencies, reduce the use of secure detention and placement in adult facilities, collect more data on Native youth in the justice system, and increase access to substance abuse and mental health treatment.

RECOMMENDATIONS

CFYJ would like to make four primary recommendations to the Coordinating Council:

1. Ensure that the Council's analysis of federal policy and practice addresses youth prosecuted in the adult criminal justice system.

The Coordinating Council cannot conduct a meaningful analysis of federal policies and practices surrounding education and at-risk youth, reentry, racial and ethnic disparities, and tribal youth without including youth prosecuted in the adult criminal justice system.

²⁶ National Council on Crime and Delinquency. (March 2008). *Native American Youth and the Juvenile Justice System*.

²⁷ Arya, N. & Rolnick, A.C. Campaign for Youth Justice. (July 2008). *A Tangled Web of Justice: American Indian and Alaska Native Youth in Federal, State, and Tribal Justice*.

²⁸ *Supra* note 26.

This Administration is moving forward to provide education and opportunities to at-risk youth. As this agenda progresses, the Coordinating Council must ensure that youth tried as adults are not shortchanged and denied their legal right to an education.

In order to provide reentering youth with a meaningful opportunity to reenter society, the Coordinating Council must support comprehensive reentry programming for all juvenile offenders, especially for those in the adult criminal justice system, and examine the unique barriers to reentry faced by youth involved with the adult criminal justice system.

Since transfer to adult court is the most disparate point in the system, the Council must address youth tried as adults in its efforts to reduce racial and ethnic disparities. For example, the Council should:

- Support strengthening the disproportionate minority contact (DMC) core requirement of the Juvenile Justice and Delinquency Prevention Act (JJDP A) by giving states specific guidance on action steps to reduce disparities, such as identifying and analyzing key decision points, including transfer to adult criminal court, to determine where disparities exist; collecting data; developing a work plan; and publicly reporting on progress.
- Support closing the loophole in the federal JJDP A law that allows youth charged as adults to be housed in adult jails.
- Support strengthening the JJDP A to require states to house youth convicted in adult court in juvenile facilities, rather than adult prisons.
- Oppose federal legislation that promotes the transfer of youth to the adult criminal justice system, mandatory minimum sentences (e.g., gang enhancements), or criminal penalties for civil violations of immigration laws.
- Provide funding for pilot projects for jurisdictions to remove youth from adult jails and prisons.

Finally, with regard to tribal youth, CFYJ recommends that the Coordinating Council strengthen tribal juvenile justice systems, improve communications between tribes and juvenile justice professionals, and reduce reliance on secure detention and placement in adult facilities. Additionally, the Council can begin to meet the needs of Native youth by providing authentic tribal support and other appropriate services, including mental health, drug, and alcohol treatment, spiritual services, counseling, and reentry programming. Finally, in order to design effective evidence-backed interventions, the Coordinating Council must collect more data on Native youth in the justice system, including the adult criminal justice system,

2. Engage youth and their families directly affected by the juvenile justice and adult criminal justice systems in policy discussions in a meaningful way.

“Two principles guide all the work we do: the importance of involving families and the importance of involving young people themselves. Now I know that the families you deal with usually don’t look like the Cosby show. They’re not the ideal we see on TV. But the best evidence we have says that these kinds of interventions are most effective when families are involved.”²⁹ – Secretary Kathleen Sebelius, U.S. Department of Health and Human Services.

Unfortunately, too often the voices of youth who are involved in the juvenile justice and adult criminal justice systems and their families are not heard during the development of policy at the federal or state level. These youth and their families are the people most impacted by the juvenile justice and adult criminal justice systems.

Even when youth and their families are represented during policy discussions, too often they are given a seat that does not have the level of power needed to actually influence decisions, or are included merely to “check a box” indicating youth and family involvement. For example, sometimes youth who serve on committees representing the voices of those involved with the juvenile justice system have been out of the system for years.

The voices of youth and families provide critical insight when developing policies affecting youth involved in the juvenile justice or adult criminal justice systems. These individuals should be given a concrete, meaningful seat at the table to provide their perspective on this population of youth and their families. The Coordinating Council cannot examine federal policy regarding its four priority areas without including the voices of youth tried as adults and their families.

CFYJ recommends that the Coordinating Council engage youth in the justice system and their families by:

- Adding family engagement to the agenda of every Council meeting and considering the input of youth involved in the adult criminal justice system and their families whenever the Council meets to analyze juvenile justice policies.
- Filling two of the Council’s nine practitioner slots with people who have been personally impacted by the trying of juveniles in the adult criminal justice system. One of these slots should be filled by someone who was tried in the adult criminal justice system as a juvenile, and the other should be filled by a family member of a youth currently or formerly involved in the adult criminal justice system.

²⁹ Kathleen Sebelius, *Remarks at the National Network for Youth 2010 Symposium* (Jan. 25, 2010), available at <http://www.hhs.gov/secretary/about/speeches/sp20100125.html>.

3. Support and prepare for a strong reauthorization of the Juvenile Justice and Delinquency Prevention Act (JJDPA).

The JJDPA—the main vehicle for juvenile justice reform at the federal level—is currently three years overdue for reauthorization, and CFYJ, along with hundreds of national, state and local organizations throughout the country are working with Congress to move legislation to reauthorize the JJDPA in 2010.

CFYJ is hopeful that JJDPA reauthorization legislation will include updates to the Act's four core requirements—disproportionate minority contact, deinstitutionalization of status offenders, jail removal and sight and sound separation—and language addressing conditions of confinement of youth in juvenile justice facilities. With regard to the jail removal and sight and sound separation core requirements, CFYJ is working to ensure that these protections apply to all youth under the age of 18, regardless of the court in which they are charged.

CFYJ recommends that the Coordinating Council support a strong reauthorization of the JJDPA, including expanding the JJDPA's jail removal and sight and sound core requirements to protect youth no matter what court they are prosecuted in—juvenile or adult.

The Coordinating Council and the OJJDP must provide support and technical assistance to 1) ensure states are in compliance with current law; 2) help those states not in compliance with current law become fully compliant; 3) encourage the development of best practices for states already in compliance with current law; and 4) assist all states in complying with any new jail removal and sight and sound separation requirements included in the forthcoming JJDPA reauthorization bill.

CFYJ also recommends that the Coordinating Council, spearheaded by the OJJDP, begin creating a plan to implement the potential JJDPA reauthorization legislation, such as holding regional conferences to educate stakeholders on the changes to the law and creating a plan for writing regulations to implement the legislation and provide technical assistance to the states. Additionally, OJJDP should spearhead the creation of funding opportunities for demonstration grants to promote successes in states that are currently going beyond the JJDPA core requirements.

4. Collect data on youth under 18 who are tried as adults.

Since the transfer of youth to adult court is the most disparate point in the system, CFYJ recommends that the Coordinating Council collaborate on a data collection project at both the state and federal level on youth prosecuted in the criminal justice system, in the aggregate and disaggregated by offense, race, ethnicity, sex, disability, geography, English proficiency, delinquency history, age, and whether the case was brought in juvenile or adult court, such as:

- The number of youth arrested for adult offenses;

- The prior record of youth arrested for adult offenses;
- The number and basis for declination of prosecution for youth who were ultimately not prosecuted as adults;
- The number and disposition of cases terminated, including dismissals, guilty pleas, and results at trial;
- The number of youth who were referred back to the juvenile justice system
- The type and form of pretrial detention release;
- The sentences imposed on youth, including type and length of sentences and method of disposition;
- The appeals filed and terminated, and the disposition of appeals;
- The factors used to determine whether to charge a youth under the age of 18 in adult criminal court, including criteria used, who and what evidence is used to make the decision, and who ultimately makes the decision; and
- The final outcomes of youth under the age of 18 charged in adult criminal court, including recidivism rates, where they are housed, and the other programs available to youth in the adult court system, including how these outcomes compare to youth who are retained in the juvenile justice system.

CFYJ also recommends that the Coordinating Council explore the long-term effects of prosecuting youth in the adult criminal justice system by comparing juvenile justice facilities and probation to adult criminal justice facilities and probation with regard to:

- The availability, quality, and utilization of age-appropriate services, including educational, health, mental health, substance abuse, and nutritional services;
- Distance from family, and its effects on youth as compared to adults;
- Disciplinary policies, including isolation, and their effects on youth as compared to adults, as well as the availability of separate, age-appropriate disciplinary policies for youth in adult facilities;
- The quality and content of staff training, including the availability and utilization of training to deal with the unique needs of juveniles;
- The availability, quality, and utilization of suicide prevention services;
- The availability, quality, and utilization of discharge and reentry planning, as well as access to programs and services before and after the youth's release; and
- The collateral consequences of an adult conviction, such as barriers to federal programs, employment, education, military service, and other programming.

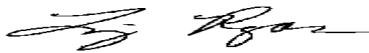
On behalf of CFYJ, thank you once again for the opportunity to offer public comments.

Please let me know if you have questions or need additional information. I can be reached at (202) 558-3580 or by email at: lryan@cfyj.org.

We would welcome the opportunity to work with you on these and other issues.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Ryan". The signature is fluid and cursive, with the first name "Liz" and last name "Ryan" clearly distinguishable.

Liz Ryan
President and CEO
Campaign for Youth Justice

cc:
Robin Delany-Shabazz
Office of Juvenile Justice and Delinquency Prevention
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Washington, DC 20531