

17-Year-Olds in Adult Court

Is There a Better
Alternative for
Wisconsin's Youth
and Taxpayers?

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Ola Lisowski

Research Associate, Maclver Institute

Marc Levin

Policy Director, Right on Crime

Director, Center for Effective Justice, Texas Public Policy Foundation



The John K. Maclver Institute for Public Policy
44 East Mifflin St., Ste. 201, Madison WI 53703
www.maciverinstitute.com

Texas Public Policy
FOUNDATION

Texas Public Policy Foundation
901 Congress Ave., Austin TX 78701
www.texaspolicy.com

Executive Summary

In the mid-1990s, increased crime rates across the country motivated legislators to stiffen criminal penalties. Policymakers and law enforcement officials nationwide hoped to deter individuals from committing crimes by lengthening mandatory minimum sentences and shuffling juveniles into the adult criminal system.

Wisconsin legislators followed suit, passing 1995 Wisconsin Acts 27 and 77, the Biennial Budget Act and the Juvenile Justice Act, respectively. The reforms expanded the use of judicial waiver, which allowed juvenile courts to transfer offenders 14 and older to adult courts for certain crimes.¹ Among several other policy changes, the reforms introduced the ‘once waived always waived’ practice.² This practice meant that juveniles whose cases were waived into adult court even once would face adult sentencing for the remainder of their youth.

Perhaps most significantly, Wisconsin lowered the age of adult court jurisdiction to 17 for all criminal offenses, providing no mechanism for those cases to be returned to juvenile court. These reforms increased the severity of consequences for 17-year-old offenders in



Wisconsin - especially those who committed serious crimes or who were repeat offenders. As a result of these changes, 17-year-old offenders from January 1, 1996 onward were treated as adults in the eyes of the law.

Today, 41 states and Washington D.C. hold the upper boundary of the juvenile court’s jurisdiction at 17 years of age.³ Seven states, including Wisconsin, draw the boundary at 16 years old, and two at 15 years old.⁴ This report considers Wisconsin’s current policy of automatically sentencing 17-year-olds in the adult system and examines whether or not it produces the best outcomes for youth, our communities, and Wisconsin’s taxpayers. We

In Wisconsin, 17-year-olds are *three times more likely* to return to prison if they go through the adult system instead of the juvenile system.

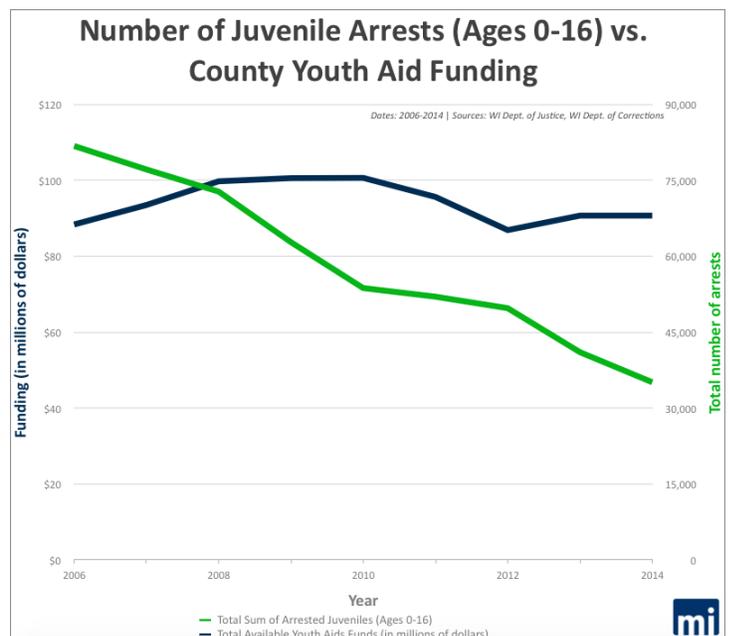
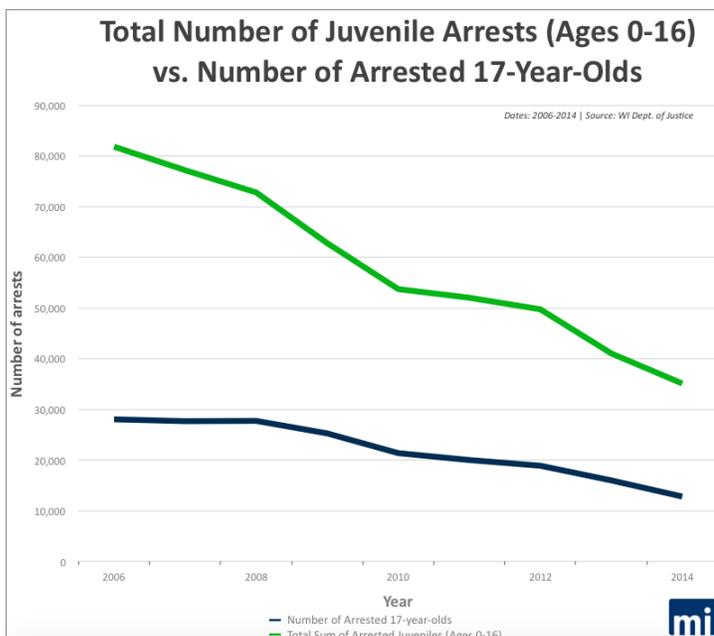
Since 2006, the number of arrested 17-year-olds has dropped by 54 percent, while Youth Aids funding rose by over \$2 million to \$90.7 million total. As a result, counties receive 47 percent more funding per juvenile arrest than they did in 2009.

will examine Wisconsin's current state of affairs, present a breadth of research and evidence, and discuss the potential benefits of moving first-time nonviolent 17-year-olds back to the juvenile system.

Research from around the country shows that the majority of 17-year-old offenders - those

who have committed a low-level crime and are of little risk to reoffend - belong under the juvenile justice system. The juvenile justice system is better equipped to handle the nuanced cases that juveniles often present, through a process that assesses youth individually, identifies intervention and accountability needs, and provides redirective services. Parents and schools play a significant role in the juvenile system, whereas the adult system does not require that parents are notified if their 17-year-old is arrested. The experience of other states has shown that returning 17-year-old first-time nonviolent offenders to the purview of the juvenile court allows both the adult and juvenile courts to process the cases they are best equipped to handle.

The concern that returning 17-year-olds to the juvenile court's jurisdiction will deprive the government of the ability to appropriately punish serious offenders is unfounded. The State of Wisconsin's criminal and juvenile codes already



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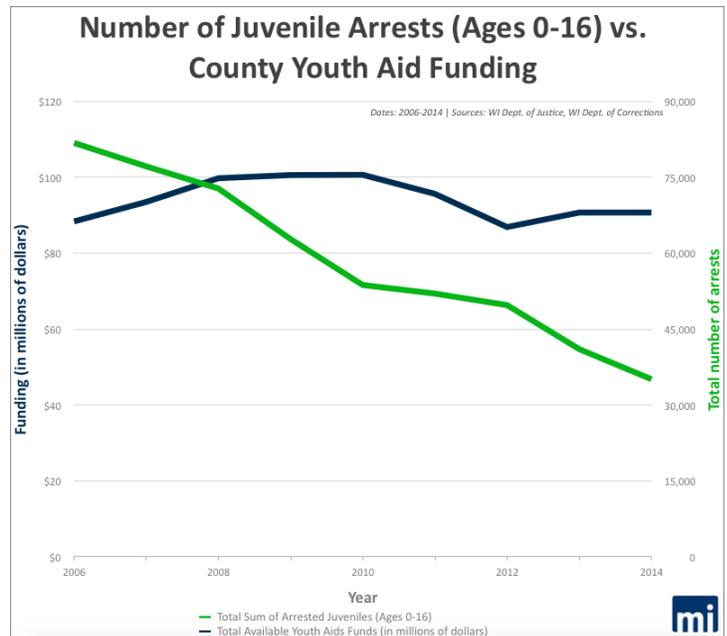
permit the transfer of serious offenders as young as 15 to the adult criminal justice system. A court, upon consideration of the juvenile's previous record, age at the time of the crime, or seriousness of the crime at hand, may grant a waiver of a juvenile to the adult criminal court.

In Wisconsin, 17-year-olds are three times more likely to return to prison if they originally go through the adult system rather than the juvenile system. As taxpayer advocates, we must question whether continually spending more money on a government program without analyzing the effectiveness or outcomes is a fiscally prudent or a just policy. We know that a government which simply throws money at problems rarely creates better outcomes. Our government is effectively spending millions of dollars a year to cycle individuals through expensive processes that are unlikely to reduce future offending. This policy is not a responsible use of taxpayer dollars, and it does not result in positive outcomes for young offenders or our communities. ■

Current State of Affairs

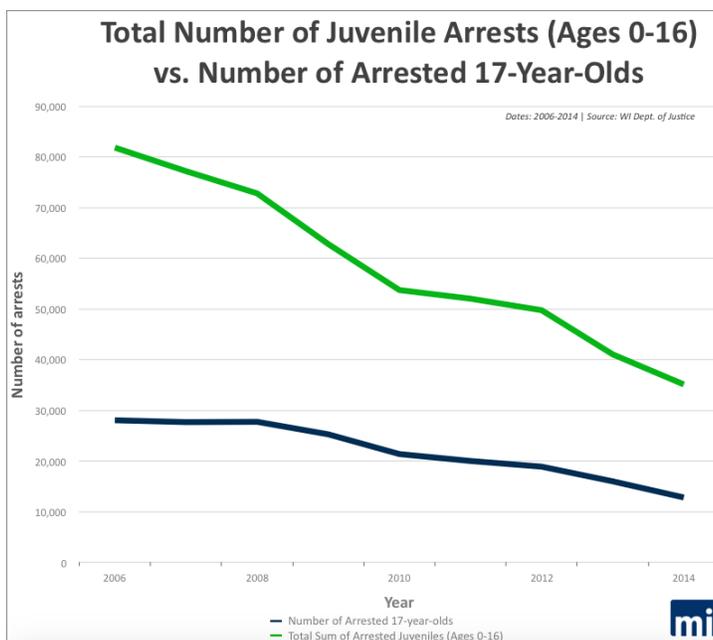
The motivation behind the 1995 reforms was understandable. Legislators sought to deter would-be juvenile delinquents by subjecting those on the periphery of the juvenile court's jurisdiction to the adult system. It was assumed just that older juveniles - who should ostensibly 'know better' - be moved to the more punitive adult court system. This deterrence rationale seems to have missed the mark, however, as the juvenile crime rates for both violent and property crimes, after a minor uptick, have resumed pre-existing declines.

Since the mid-90s, crime rates have fallen both in Wisconsin and nationwide. In Wisconsin, the juvenile arrest rate fell by 38 percent from 2003-2012.⁵ While Wisconsin has relatively low levels of crime, it has reported smaller declines compared to the rest of the country.⁶



At the same time, spending on the criminal justice system has increased dramatically. In 1980, Wisconsin corrections facilities housed about 3,980 adults and juveniles at a cost of \$221 million.⁷ In 2006, just 26 years later, the state prison population had exploded to 22,069 individuals - a 445 percent increase - and a running cost of \$1.03 billion, a 467 percent increase.⁸

Wisconsin's juvenile arrest rate has decreased at the same time that per capita juvenile corrections spending has increased.⁹ The number of juvenile arrests fell by more than half from 2006 to 2014, from 81,821 to 35,127.¹⁰ When looking at 17-year-olds, 28,062 were arrested in 2006 compared to just 12,838 in 2014 - a drop of 54 percent.¹¹ Despite the dramatic fall in juvenile arrests, the amount that counties received in Youth Aids Funds rose from \$88 million in 2006 to \$90.7 million in 2014.¹² Given the smaller numbers of juveniles being arrested and the increased funding to counties, the amount of money that counties receive per juvenile arrest has increased 47 percent since 2009.¹³



WHAT ABOUT CARJACKING?

Carjackings continue to plague Milwaukee

-WISN-TV, 1/25/2016

The rising number of carjackings in Milwaukee and the publicity surrounding these crimes has raised questions as to whether keeping nonviolent first-time minors in the juvenile system would shield carjacking youth.

The short answer is no. Carjacking is considered a violent crime, so a minor caught carjacking would still be sentenced in the adult system.

Milwaukee carjacker sentenced to 50 years imprisonment

-U.S. Dept. of Justice, 12/7/2015

Since the 1995 reforms, researchers around the world have made significant progress in studying the development of the human brain.¹⁴ Scientific advances, studies in deterrence, and the Supreme Court's involvement in this issue have all furthered our understanding of the way that children differ from adults. ■

The Research

Is the Adult System an Effective Deterrent for 17-Year-Old Offenders?

The twofold logic behind the adult court having jurisdiction over 17-year-old juvenile offenders is reasonable. The juvenile court is focused primarily on rehabilitation rather than punishment, which some see as granting leniency to the offender. The rationale of deterrence tells us that with a lack of real punishment, the individual will likely reoffend. Additionally, others may see how this bad behavior is not thoroughly punished and so may not be dissuaded from behaving badly. However, the intended effect of this policy has not been substantiated in academic literature and in state case studies over the decades.

In 1994, for example, the state of Georgia sought to restrict access to juvenile court for those accused of serious crimes such as aggravated assault, robbery, sexual offenses, and murder. The law required that any individual between the ages of 13 and 17 be subject to the jurisdiction of the adult criminal court. A quasi-experimental cohort design study on juvenile arrest rates before and after Georgia's Senate Bill 440 went into effect has

shown no significant change in juvenile arrest rates in the years following its enactment.¹⁵

New York also enacted legislation with this rationale in mind. In 1978, following a string of violent crimes with heavy media coverage, the state passed the New York Juvenile Offender Law as part of the Crime Package Bill. The legislation limited access to juvenile courts for offenders aged 13 through 15 who were accused of certain crimes. It also expanded the availability of transfers to the adult court.

Legislators and the public widely expected to see a large drop in crime as a result of the changes, but no such drop ever occurred. A 1988 study analyzed the 56 months before and 76 months after the law's enactment and focused on cohort-specific arrest rates of homicides, assaults, robberies, rapes, and arsons.¹⁶ The study's authors concluded that the arrest rates for most offenses remained constant or increased over the time period of the study.¹⁷ The only statistically significant observed decline was in the arrest rate for rapes, though a corresponding decline was

A study in Minnesota showed that youths tried as adults were 16 percent more likely to reoffend than those tried in the juvenile court system.

also observed in the control series and as such, was attributable to a nationwide trend rather than the law itself.¹⁸

Case studies from across the country have shown the same absence of effect in jurisdictions which sought to restrict juvenile court access. In 1981, Idaho attempted to address the growing concern over juvenile crime by enacting a mandatory transfer statute. Researchers found no drop in crime attributable to the statute.¹⁹ Notably, the law's enactment preceded an 18 percent increase in arrest rates for violent index crime offenses.²⁰ This increase is contrary to the significant decreases in Montana and Wyoming, the study's comparison series.²¹

These findings echo the majority of academic literature on deterrence - that increasing punitiveness in the hopes of deterring crime is rarely fruitful. This is particularly true for juveniles and young adults, since the philosophy of deterrence applies an understanding of decision-making which poorly reflects juvenile cognitive processes. Neurobiological research since Wisconsin's 1995 reforms has provided new insight into the still-developing juvenile brain, as well as context for the aforementioned experiences in different states.

Science, the Supreme Court, and the Governor's Juvenile Justice Commission

Since the enactment of Wisconsin's 1995 reforms, neurobiological research has furthered our understanding of the still-developing juvenile brain. Magnetic

resonance imaging has allowed researchers to view images of the brain throughout various stages of development. With this technology, researchers have determined that the prefrontal cortex - the area of the brain that controls impulsive behavior and rational thought - is not fully developed until individuals are in their early 20s.²² As such, researchers have confirmed that "a developing brain has a lesser ability to make sound judgments or to determine that a certain choice is a bad one."²³

In 2005, the United States Supreme Court adopted this rationale in the case of *Roper v. Simmons*.²⁴ The Court ruled it to be unconstitutional to use the death penalty on an offender who committed a crime under the age of eighteen. In his opinion for the majority, Justice Kennedy referenced scientific research in establishing a different level of moral culpability in juveniles:

First, as any parent knows and as the scientific and sociological studies respondent and his amicus tend to confirm, "[a] lack of maturity and an underdeveloped sense of responsibility are found in youth more often than in adults and are more understandable among the young."²⁵

Justice Kennedy goes on to write that "from a moral standpoint it would be misguided to equate the failings of a minor with the failings of an adult, for a greater possibility exists that a minor's character deficiencies will be reformed."²⁶

Given the developments in neurobiological research and in the Supreme Court since

1995, the current system of processing youth through the adult criminal justice system no longer conforms to scientific understanding or legal precedent. This reasoning has been adopted in Wisconsin by the Governor's Juvenile Justice Commission (GJJC).

The GJJC is a board comprised of individuals with expertise and professional experience in the juvenile justice system. The board is charged with advising the Governor and the Legislature on matters relating to juvenile justice. In October of 2015, the GJJC unanimously voted to recommend the return of all 17-year-olds to the juvenile justice system, citing the past two decades of scientific research and "the effectiveness of evidence-based treatment, adolescent brain development, and juvenile delinquency prevention and intervention approaches." The Commission called on the Governor and the Legislature to reform current practices and bring existing policy in line with this knowledge.²⁷

Does the Adult System Increase or Decrease Recidivism?

Rehabilitation, in general, offers better future outcomes for the offender and likewise the public through increased safety. However, it is imperative that the offender is placed within the correct rehabilitation program - one that is suited to their risks and needs. Research has shown that properly ascribed rehabilitation is likely to reduce recidivism. The juvenile system has always been more centered on rehabilitation of offenders than the adult justice system.

A study of over 2,000 delinquent youth in New York and New Jersey addressed the variation in outcomes between the adult and juvenile courts. Juveniles arrested in New York are tried before the adult court, and in New Jersey nearly all adolescent offenders of the aforementioned laws are tried before a juvenile court.²⁸ The results were staggering: youth with similar cases who were tried before an adult court were 85 percent more likely to be rearrested for violent crimes and 44 percent more likely to be rearrested for felony property crimes in comparison to those tried before a juvenile court.²⁹ Furthermore, those tried as adults were 26 percent more likely to be reincarcerated within the follow-up period.³⁰

A 2002 study of Florida juvenile offenders found similar results. Taking a sample of 900 youth arrested between 1993 and 1995, researchers created 475 pairs matched by demographic characteristics and elements of the crime. In each pair, one of the juveniles had been transferred to the adult criminal court while the other was adjudicated in the juvenile court. In nearly 29 percent of the matched pairs, only the youth transferred to the adult criminal court reoffended, compared to the 14.7 percent of pairs in which only the offender tried before the juvenile court reoffended.³¹ Amongst the pairs in which both juveniles reoffended, the youth transferred to the adult criminal court were likely to have committed a more serious felony than the youth processed in the juvenile court.³² Further, those youth processed as adults were 15 percent more likely to reoffend in adulthood.³³ In Minnesota, an outcome study of the waiver process showed that youths who were tried as adults were 16 percent

In Wisconsin, 48 percent of 17-year-olds who were originally sentenced in adult court were reincarcerated. In contrast, only 27 percent of 17-year-olds adjudicated through the juvenile system were reincarcerated.

more likely to reoffend than those tried in the juvenile court system.³⁴

In 2009, the Illinois Legislature considered a proposal that would allow offenders 17 years old and younger to be processed through the juvenile court.³⁵ During the general session, fervent debate occurred over whether the proposal would lead to a marked decline in public safety and a spike in juvenile crime. An evaluation of immediate outcomes was conducted, finding that crime continued to decline after the law took effect.³⁶ Following the Illinois reforms, the state was able to close three juvenile detention facilities because of low occupancy and other budget constraints.³⁷

The Illinois experience echoes the findings of related academic literature. Researchers have proven that deterrence policies are much less effective on juveniles, who have poor rehabilitation outcomes when processed through the adult system. Furthermore, facilities designed for and primarily occupied by adult offenders are

often dangerous, ineffective options for juveniles.

In a 2010 summary report, the federal government's Office of Juvenile Justice and Delinquency Prevention found a striking consensus that, even when considering different methods for determining recidivism, transfer mechanisms, and statutory contexts, juveniles adjudicated in adult criminal courts experience worse outcomes than do those processed in the juvenile courts.³⁸ The Task Force on Community Preventive Services, an independent public health best practices organization, conducted a systematic review of seven seminal studies. In the analysis of median change in rates of re-arrest, the group concluded that juveniles adjudicated in the adult criminal court were, in general, at a near 34 percent greater likelihood to be arrested for a subsequent crime than were the youths whose cases were handled in the juvenile system.³⁹ As such, it can be reasonably concluded that handling juveniles in the adult criminal court is detrimental to the rehabilitative efforts of the criminal justice system.

This divergence exists in Wisconsin as well. A 2008 Legislative Audit Bureau report observed that 17-year-old defendants in the adult criminal system are three times more likely than adult offenders or younger juveniles to return to prison. Of the juveniles and adults who were released in 2002, 48.1 percent of 17-year-olds subject to the adult criminal court were re-incarcerated within a three-year follow-up window, compared to 21.3 percent of adults overall and 18.2

percent and 26.6 percent of juveniles (in the two- and four-year follow-up windows, respectively).⁴⁰

The same report also found that 17-year-old offenders had higher recidivism rates than the adult probation population as a whole.⁴¹ Of offenders placed on probation in 2002, 36.9 percent of 17-year-old offenders were subsequently sentenced to adult corrections within three years.⁴² During the same time period, the same was true for only 19.1 percent of adult offenders.⁴³

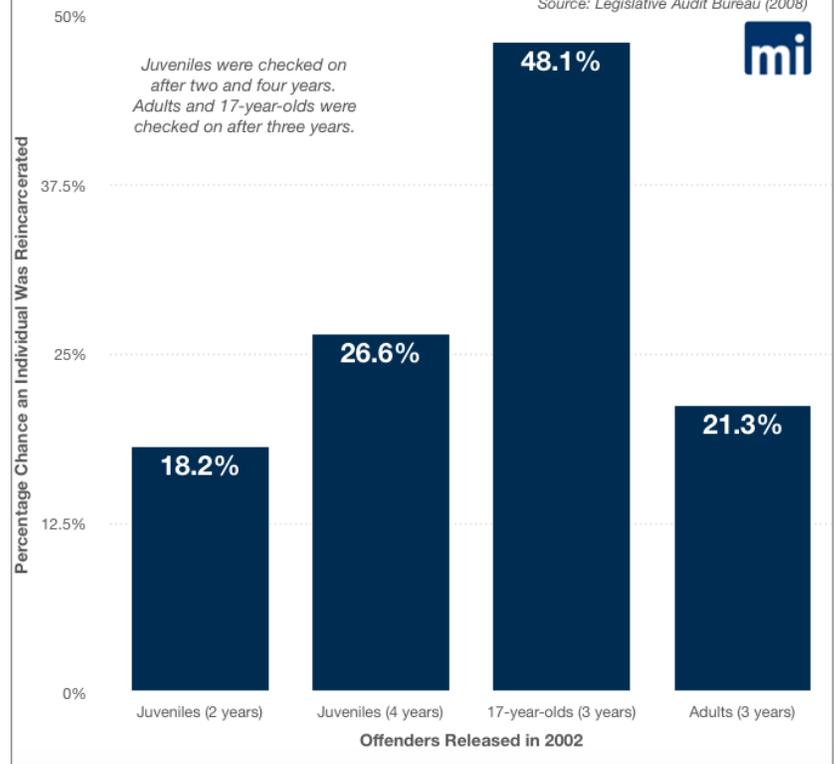
These differences in results demonstrate that juveniles offenders are more likely to re-offend if their cases are initially processed through the adult system rather than the juvenile system.

Research at the federal level has highlighted the same trends nationwide. The U.S. Centers for Disease Control and Prevention and the Office of Juvenile Justice and Delinquency Prevention found that youth under eighteen who are transferred from the juvenile court system to the adult criminal system are 34 percent more likely than youth retained in the juvenile court system to be rearrested.⁴⁴

Evidence shows that keeping youth in the juvenile system results in lower rates of recidivism, which in turn reduces costs in the future.

Wisconsin Reincarceration Rates

Source: Legislative Audit Bureau (2008)



Safety Concerns

Although state and federal law provide some protections for juveniles held within the adult correctional system, it does permit juveniles to be housed in an adult jail or correctional facility. These facilities are rarely equipped with age-appropriate juvenile-oriented rehabilitation or education programs. For youth placed in an adult facility for any length of time, this pause in development has the heavy consequence of releasing the youth poorly equipped to secure meaningful employment upon release while the youth's underlying criminality remains unaddressed. Secure confinement is also likely to lead to the potential for victimization and self-harm.

Researchers at the University of Texas at Austin anticipate that each cohort of 17-year-olds moved into the juvenile justice system would provide a net benefit of \$88.9 million to taxpayers, victims, and youth.

In spite of the entirety of the juvenile offender population being school-aged, adult facilities rarely provide adequate education. Nationwide, roughly 40 percent of jails provide no educational programming, and only 7 percent provide vocational programming.⁴⁵

Victimization is an ever-present threat. Juveniles who are held in adult facilities have a 50 percent higher likelihood of being assaulted by an inmate using a weapon.⁴⁶ Official reports also estimate that juveniles, while comprising less than one percent of jail inmates, represented 21 percent of sexual victimizations.⁴⁷ One study found youths 36 times more likely to commit suicide in an adult jail than in a juvenile facility.⁴⁸

Juveniles who are adjudicated in an adult criminal court are likely to receive longer sentences than those adjudicated in a juvenile court. A 2004 study suggests that youth handled in the adult court system are subject to a ‘juvenile penalty’; that is, the very fact that their case has been transferred into the adult criminal court suggests that the youth is more blameworthy and deserving of punishment. As such, the authors estimate that juveniles

received markedly longer (from 7 to 43 percent) sentences than young adults accused of similar crimes, net of all legal variables. Juveniles who are remanded to secure, adult-oriented confinement are in turn subject to the deleterious effects of imprisonment.⁴⁹ ■

The Potential Benefits of Raising the Age of the Juvenile Court’s Jurisdiction

Cost has been a major concern throughout the public debate on this issue. Upfront costs are higher for juveniles, but the higher recidivism rates for juveniles in the adult system pose significant long-term costs. The Wisconsin Council on Children and Families estimates that for every 1,000 17-year-olds dealt with in the juvenile court rather than the adult system, 122 fewer youth reoffend.⁵⁰ As such, Wisconsin could see \$5.8 million in direct savings each year through lowered law enforcement costs and losses to victims.⁵¹ Additionally, the National Council on Crime and Delinquency estimates that for each percentage point reduction in overall crime, Wisconsin’s GDP increases by \$10.6 million, whereas any increase in overall crime slows job growth.⁵²

Compared to adult correctional facilities, juvenile facilities and services are more expensive.⁵³ Smaller caseloads, lower staff-to-inmate ratios, wrap-around juvenile programming, and the general difference in economies of scale create this disparity. Populations at juvenile correctional facilities have declined 55 percent between



2004 and 2014, resulting in increasing daily rates for facility care.⁵⁴ The annual cost for a juvenile placement has increased over 48 percent, from \$74,095 in 2005-06 to \$109,865 in 2014-15.⁵⁵

However, existing research suggests that the savings a state can garner through the proper classification and treatment of juvenile offenders may outstrip initial costs of providing such programs. Connecticut, for example, experienced a savings of nearly \$12 million after it raised the juvenile court's age of jurisdiction from 15 to 17.⁵⁶ Funding was appropriated anticipating a 40 percent growth in juvenile caseloads as 16- and 17-year-old offenders entered the system, though the overall caseload only grew by 22 percent.⁵⁷

Texas is perhaps the most prominent "conservative" state which has looked at similar reforms. An attempt to move juveniles back to the juvenile court system narrowly failed in 2015, though advocates expect that the next legislative session will hold better outcomes for them. Meanwhile, lecturers at the University of Texas at Austin have shown

that raising the age of juvenile jurisdiction would have a net benefit of \$88.9 million for every cohort of 17-year-olds moved into the juvenile system in Texas.⁵⁸ They anticipate an investment of \$50.9 million per cohort would result in \$139.9 million in benefits to taxpayers, victims, and youth and write that "not only would raising the age of juvenile jurisdiction be beneficial to our state's youthful offenders with no detrimental effect on public safety, but it would be beneficial for Texas, its counties, taxpayers, and potential victims in the long run."⁵⁹

The State of Wisconsin sends approximately \$90 million to the counties to help pay for the juvenile system, and the rest is paid by county property tax levies. Should a policy change occur, the counties would be charged with paying for an estimated 3,600 more juveniles.⁶⁰ As such, the Wisconsin Counties Association has been one of the most vocal opponents of moving 17-year-olds back to the juvenile system, arguing that such a change would constitute an unfunded mandate. However, only about half of those individuals will require formal court action,

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intake assessment, ongoing supervision, and additional services, according to juvenile justice experts who contend that the counties' estimate is at least double the actual cost.⁶¹

Evidence from the Wisconsin Department of Justice, Wisconsin Department of Corrections, and juvenile justice experts does not support the counties' argument. Juvenile arrests fell by more than half from 2006 to 2014, while the amount that counties received in Youth Aids Funds rose by more than \$2 million during the same time period.⁶² Given the smaller number of juveniles being arrested and the increased funding to counties, the amount of money that counties receive per juvenile arrest has increased 47 percent since 2009.⁶³ If we are to be mindful stewards of our tax dollars, we must question whether current policy is effective at rehabilitating our youth, or whether it is simply spending millions of dollars to expose young offenders to older criminals, vastly increasing costs long-term. ■

Conclusion

After more than 20 years of automatically sentencing 17-year-olds in the adult system, our report shows that it may be time to rethink this policy for Wisconsin. The juvenile justice system not only serves 17-year-olds better, but also provides a more cost-effective solution for taxpayers. Recidivism rates in Wisconsin and across the country provide evidence that we are spending more money on the criminal justice system while getting worse outcomes overall - especially when it comes to juveniles.

The adult criminal system has failed in successfully rehabilitating 17-year-olds, who are three times more likely than adults to return to prison if they are originally prosecuted through the adult system. Returning 17-year-old first-time nonviolent offenders to the purview of the juvenile court allows both the adult and juvenile courts to process the cases they are best equipped to handle.

While Wisconsinites want to feel safe and expect their elected officials to pursue policies that keep them safe, time has shown that automatically sentencing nonviolent juvenile offenders as adults does not accomplish this goal. Taxpayers, too, would be better served if nonviolent 17-year-olds were handled by the juvenile system. In light of the new evidence presented in this report, policymakers should pursue strategies that are more productive for juveniles and more cost-effective for taxpayers. ■



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² Wis. Stat § 938.01.

³ Angel Zang, "U.S. Age Boundaries of Delinquency," *Juvenile Justice Geography, Policy, Practice & Statistics* (2015). Online. Available: http://www.ncjj.org/pdf/JJGPS%20StateScan/JJGPS%20%20U.S.%20age%20boundaries%20of%20delinquency%202015_8.pdf

⁴ Ibid.

⁵ "Juvenile Justice and Youth Aids Program, Informational Paper 56," *Wisconsin Legislative Fiscal Bureau* (2015). Online. Available: http://docs.legis.wisconsin.gov/misc/lfb/informational_papers/january_2015/0056_juvenile_justice_and_youth_aids_program_informational_paper_56.pdf

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⁷ Wisconsin Legislative Fiscal Bureau.

⁸ Ibid.

⁹ "Fact Check: Wisconsin Counties Association Memo," The John K. MacIver Institute for Public Policy, <http://www.maciverinstitute.com/MacIver%2017%20Year%20Olds%20Fact%20Check%20w%20link.pdf>

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¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Boggs, 11.

¹⁵ Edwin Riskler et al, "Evaluating the Georgia Legislative Waiver's Effectiveness in Deterring Juvenile Crime," *Research on Social Work Practice*, Vol. 8:6 (1998).

¹⁶ Simon Singer and David McDowall, "Criminalizing Delinquency: The Deterrent Effects of the New York Juvenile Offender Law," *Law & Society Review*, Vol. 22:3 (1988).

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²² Boggs, 11.

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²⁴ 543 U.S. 551 (2005).

²⁵ *Roper v. Simmons*. U.S. Supreme Court. 1 Mar. 2005. *Legal Information Institute*. Cornell University Law School. Web.

²⁶ Ibid.

²⁷ Governor's Juvenile Justice Commission, "Recommendation Related to the Age of Adult Court Jurisdiction." Letter to Gov. Scott Walker. 29 Oct. 2015. Online. Available: http://www.thewheelerreport.com/wheeler_docs/files/1130jjc.pdf.

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²⁹ Ibid.

³⁰ Ibid.

³¹ Lonn Lanza-Kaduce et al, "Juvenile Transfer to Criminal Court Study: Final Report," Research Report for the Florida Department of Juvenile Justice, (2002).

³² Ibid.

³³ Ibid.

³⁴ Marcy Podkopacz and Barry Feld, "The End of the Line: An Empirical Study of Judicial Waiver," *Journal of Criminal Law & Criminology*, Vol. 86:2 (1996).

³⁵ Illinois Juvenile Justice Commission, "Raising the Age of Juvenile Court Jurisdiction," (2011). Online. Available: <http://ijjc.illinois.gov/sites/ijjc.illinois.gov/files/assets/IJJC%20-%20Raising%20the%20Age%20Report.pdf>

³⁶ Ibid.

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⁴² Ibid.

⁴³ Ibid.

⁴⁴ Board, Legislative Budget. "Criminal Justice Uniform Cost Report." (2011).

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