COMMONWEALTH OF KENTUCKY
SUPREME COURT
NO. 2017-SC-000436
(Court of Appeals No. 2017-CA-001327)

COMMONWEALTH OF KENTUCKY

APPELLANT,

v.

TRAVIS M. BREDHOLD,

APPELLEE.

Upon a Motion to Transfer Review of Decision in the Fayette Circuit Court, No. 14-CR-161

Brief of Juvenile Law Center; Children's Law Center, Inc.; Atlantic Center for Capital Representation; Campaign for the Fair Sentencing of Youth; Campaign for Youth Justice; Center for Law, Brain and Behavior; Center on Wrongful Convictions of Youth; Children & Family Justice Center; Fair Punishment Project; Florida Center for Capital Representation; Justice Lab at Columbia University; Phillips Black Inc.; Roderick and Solange MacArthur Justice Center; Southern Poverty Law Center; Youth First; and Youth Sentencing & Reentry Project as *Amici Curiae* in Support of Appellee Travis Bredhold

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of this brief have been served via first class U.S. mail on this 25th day of June, 2018 to the following: Clerk of the Supreme Court of Kentucky, State Capitol, Room 235, 700 Capitol Avenue, Frankfort, KY 40601-3415. The undersigned further certifies that copies of this brief have been served via first class U.S. mail to the following: Timothy G. Arnold, Department of Public Advocacy, 5 Mill Creek Park, Frankfort, KY 40601; Hon. Jason B. Moore, Assistant Attorney General, Criminal Appeals, Office of the Attorney General, 1024 Capital Center Drive, Frankfort, KY 40602-2000; Hon. Sam Givens, Clerk of the Court of Appeals, 360 Democrat Drive, Frankfort, KY 40601; Hon. Ernesto Scorsone, Fayette Circuit Court, 120 N. Limestone, Lexington, KY 40507.

Counsel for Amici Juvenile Law Center et al.

STATEMENT OF POINTS AND AUTHORITIES

ARGUMENT

3. State sentencing practices demonstrate a trend toward abolishing the death penalty and other severe sentences for young adults under age 21

ARGUMENT

The United States Supreme Court has recognized that certain classes of individuals are ineligible for the death penalty under the Eighth Amendment's ban on cruel and unusual punishment. *See Atkins v. Virginia*, 536 U.S. 304, 319 (2002); *Roper v. Simmons*, 543 U.S. 551, 578 (2005). In *Roper*, the Court banned the death penalty for youth under 18 years of age due to their reduced culpability, which the Court found precluded viewing them as among the worst offenders in the justice system for whom the death penalty must be reserved. *Roper*, 543 U.S. at 569-70. Their diminished culpability was established through scientific research confirming three key attributes of young people—immaturity and impetuosity in their decision making; susceptibility to negative peer influences; and a lack of fully formed character—all making them especially capable of rehabilitation. *Id.* Emerging research now confirms that these qualities of young offenders persist into young adulthood, often into one's mid-twenties, resulting in the diminished culpability of this population as well. Accordingly, the death penalty is unconstitutional even for young adults who are likewise less blameworthy for criminal conduct, including murder.

I. OBJECTIVE INDICIA OF EVOLVING STANDARDS OF DECENCY REQUIRE ABOLITION OF THE DEATH PENALTY FOR YOUNG ADULTS WHO WERE UNDER 21 YEARS OF AGE AT THE TIME OF THEIR OFFENSE

To determine whether a punishment is so disproportionate as to be cruel and unusual, the U.S. Supreme Court has "established the propriety and affirmed the necessity of referring to 'the evolving standards of decency that mark the progress of a maturing society.'" *Roper*, 543 U.S. at 560-61 (quoting *Trop v. Dulles*, 356 U.S. 86, 100-01 (1958) (plurality opinion)). Because of the death penalty's unique "severity and irrevocability," *Gregg v. Georgia*, 428 U.S. 153, 187 (1976), the Court also conducted its own independent

analysis of whether the sanction meets the four objectives of the criminal justice system and found that "[u]nless the imposition of the death penalty . . . 'measurably contributes to [either retribution or deterrence of capital crimes by prospective offenders],' it 'is nothing more than the purposeless and needless imposition of pain and suffering,' and hence an unconstitutional punishment.'" *Atkins*, 536 U.S. at 319. To ensure that imposition of the death penalty comports with these standards, certain classes of offenders are categorically exempt from capital punishment.

While at common law only children under 7 years of age were exempt from the death penalty (or any criminal sanction), *see In re Gault*, 387 U.S. 1, 16 (1967) ("At common law, children under seven were considered incapable of possessing criminal intent. Beyond that age, they were subjected to arrest, trial, and in theory to punishment like adult offenders."), the Supreme Court has more recently reconsidered the eligibility of children for the death penalty in light of its modern Eighth Amendment analysis. In 1988, the Court ruled the death penalty unconstitutional for children under the age of 16. *Thompson v. Oklahoma*, 487 U.S. 815, 838 (1988) (plurality opinion) ("[W]e are not persuaded that the imposition of the death penalty for offenses committed by persons under 16 years of age has made, or can be expected to make, any measurable contribution to the goals that capital punishment is intended to achieve."). One year later, the Court declined to extend its ban on execution to 16- and 17-year-olds, *Stanford v. Kentucky*, 492 U.S. 361, 380 (1989), *abrogated by Roper v. Simmons*, 543 U.S. 551 (2005), but revisited the issue just 15 years later, holding that it was unconstitutional to impose the death penalty on individuals who were under eighteen at the time of their offense. *Roper*, 543 U.S. at 570-72. ("In *Thompson*, a plurality of the Court recognized the import of these characteristics

with respect to juveniles under 16 and relied on them to hold that the Eighth Amendment prohibited the imposition of the death penalty on juveniles below that age. We conclude the same reasoning applies to all juvenile offenders under 18. Once the diminished culpability of juveniles is recognized, it is evident that . . . . neither [of the two penological justifications for the death penalty] retribution nor deterrence provides adequate justification for imposing the death penalty on juvenile offenders.") (internal citations omitted).

In *Roper*, the Court considered both legislative enactments and the actual imposition of the death penalty on youth under age 18 as objective indicia of whether the death penalty was a disproportionate punishment for children. *Roper*, 543 U.S. at 564. The Court concluded that there was a national consensus against the juvenile death penalty because more than half of states—thirty plus the District of Columbia—prohibited the death penalty for juveniles, including states that had rejected the death penalty altogether. *Id.* The Court then conducted its own independent analysis to determine if the punishment served the four objectives of the criminal justice system—deterrence, retribution, incapacitation, and rehabilitation—and found, in light of scientific research demonstrating certain categorical characteristics of youth under 18, that the punishment violated the Eighth Amendment's proscription against cruel and unusual punishment. *Id.* at 568-570.

Today, newer neuroscientific research, state practices in imposing the death penalty, and recent legislative developments require that this line of eligibility be extended to individuals between the ages of 18-21.

A. Neuroscience Establishes That The Developmental Characteristics Of Youth Which Barred The Death Penalty For Children In *Roper v. Simmons* Persist Into Young Adulthood

The U. S. Supreme Court has firmly established that children are developmentally different from adults and these differences exempt children from our most severe punishments. *See, e.g.*, *Roper*, 543 U.S. at 578 (holding that the Eighth Amendment forbids imposition of the death penalty on offenders who were under the age of 18 when their crimes were committed); *Graham v. Florida*, 560 U.S. 48, 82 (2010) (holding juvenile life without parole sentences unconstitutional for individuals convicted of non-homicide offenses); and *Miller v. Alabama*, 567 U.S. 460, 465 (2012) (holding all mandatory life without parole sentences for juveniles unconstitutional).

The Court's conclusions in each of these cases were predicated on scientific research identifying three developmental differences between youth and adults: youth's lack of maturity and impetuosity in their decision making; youth's susceptibility to outside influences, and in particular negative peer influences; and youth's capacity for change. *See Montgomery v. Louisiana*, __ U.S. __, 136 S. Ct. 718, 733 (2016) (quoting *Miller*, 567 U.S. at 471). Given the transience of this developmental stage, these characteristics establish the diminished culpability of juvenile defendants; their "conduct is not as morally reprehensible as that of an adult." *Roper*, 543 U.S. at 570 (quoting *Thompson*, 487 U.S. at 835). Empirical research now demonstrates that these developmental and neurological traits of youth are also present in young adults, likewise rendering this population less culpable and thus less deserving of the most serious punishments.

1. Young adults exhibit the same immaturity and susceptibility to peer influence as adolescents under 18

Neuroscientific research establishes that the still-developing portions of the brain associated with the youthful characteristics cited by the Court in *Roper*, *Graham*, and *Miller* are in fact still developing in individuals past age 18, into a person's mid- to late-twenties. *See* Christian Beaulieu & Catherine Lebel, *Longitudinal Development of Human Brain Wiring Continues from Childhood into Adulthood*, 27 J. NEUROSCIENCE 31 (2011); Adolf Pfefferbaum et al., *Variation in Longitudinal Trajectories of Regional Brain Volumes of Healthy Men and Women (Ages 0 to 85 Years) Measures with Atlas-Based Parcellation of MRI*, 65 NEUROIMAGE 176, 176-193 (2013). One longitudinal study which tracked the brain development of 5,000 children demonstrated that their brains were not fully mature until at least 25 years of age. Nico U. F. Dosenbach et al., *Prediction of Individual Brain Maturity Using fMRI*, 329 SCI. 1358, 1358-59 (2010). Moreover, the characteristics cited by the Supreme Court in support of increased constitutional protection for juveniles continue "far later than was previously thought," at least through age 21. Vincent Schiraldi & Bruce Western, *Why 21 year-old offenders should be tried in family court*, Wash. Post (Oct. 2, 2015), https://www.washingtonpost.com/opinions/time-to-raise-the-juvenile-age-limit/2015/10/02/948e317c-6862-11e5-9ef3-fde182507eac_story.html?utm_term=.82fc4353830d. "Young adults are more similar to adolescents than fully mature adults in important ways. They are more susceptible to peer pressure, less future-oriented and more volatile in emotionally charged settings." *Id.*; Elizabeth Cauffman & Laurence Steinberg, *Emerging Findings from Research on Adolescent Development and Juvenile Justice*, 7 VICTIMS & OFFENDERS 428, 434 (2012).

Young adults, like adolescents, are more prone to risk-taking, acting in impulsive ways that likely influence their criminal conduct, and are not yet mature enough to anticipate the future consequences of their actions. *See* Elizabeth S. Scott et al., *Young Adulthood as a Transitional Legal Category: Science, Social Change, and Justice Policy*, 85 FORDHAM L. REV. 641, 644 (2016), Laurence Steinberg et al., *Age Differences in Future Orientation and Delay Discounting*, 80 CHILD DEV. 28, 35 (2009). These behavioral characteristics are intimately related to the continuing physical development and maturation of young adult brains. For example, young adults' propensity for risky behaviors, including "smoking cigarettes, binge drinking, driving recklessly, and committing theft," exists into early adulthood past 18, because of a young adult's "still maturing cognitive control system." Alexander Weingard et al., *Effects of Anonymous Peer Observation on Adolescents' Preference for Immediate Rewards*, 17 DEVELOPMENTAL SCI. 71 (2013). Furthermore, the development of the prefrontal cortex which plays an "important role" in regulating "impulse control," decision-making, and pre-disposition towards "risk[y]" behavior, continues at least until age 21. Kathryn Monahan et al., *Juvenile Justice Policy and Practice: A Developmental Perspective*, 44 CRIME & JUSTICE: A REVIEW OF RESEARCH 577, 582 (2015). *See also* Brief for Am. Med. Ass'n & Am. Acad. Child & Adolescent Psychiatry as Amici Curiae in Support of Neither Party at 19-20, *Miller v. Alabama*, 567 U.S. 460 (2012) (Nos. 10-9646, 10-9647) ("[R]esponse inhibition, emotional regulation, planning and organization . . . continue to develop between adolescence and young adulthood." (second alteration in original) (citations omitted)).

Young adults also remain highly susceptible to peer pressure. *See* Melissa S. Caulum, *Postadolescent Brain Development: A Disconnect Between Neuroscience,*

Emerging Adults, and the Corrections System, 2007 WIS. L. REV. 729, 731-32 (2007) ("When a highly impressionable emerging adult is placed in a social environment composed of adult offenders, this environment may affect the individual's future behavior and structural brain development." (citing Craig M. Bennett & Abigail A. Baird, *Anatomical Changes in Emerging Adult Brain: A Voxel-Based Morphometry Study*, 27 HUM. BRAIN MAPPING 766, 766–67 (2006))). In a sample of 306 individuals in 3 age groups—adolescents (13-16), youths (18-22), and adults (24 and older)—one study found that "although the sample as a whole took more risks and made more risky decisions in groups than when alone, this effect was more pronounced during middle and late adolescence than during adulthood" and that "the presence of peers makes adolescents and youth, but not adults, more likely to take risks and more likely to make risky decisions." Margo Gardner & Laurence Steinberg, *Peer Influence on Risk Taking, Risk Preference, and Risky Decision Making in Adolescence and Adulthood: An Experimental Study,* 41 DEV. PSYCHOL. 625, 632, 634 (2005). The presence of peers has also been shown to double risk-taking among adolescents, increasing it by fifty percent among young adults, but having no effect on older adults. Laurence Steinberg, *A Social Neuroscience Perspective on Adolescent Risk-Taking*, 28 DEVELOPMENTAL REV. 78, 91 (2008).

2. Young adult brain functions relevant to culpability develop later than those areas of the brain associated with judgment or decision-making activities

It is undisputed that various regions of the brain develop at different rates or times during the course of human development. An individual's ability to exercise certain "adult" rights and responsibilities such as voting is not necessarily dispositive of their ability to perform all tasks associated with adulthood.

Research confirms that the portions of the brain associated with the activities involving informed decision-making and logical reasoning, such as voting, develop earlier and more quickly, meaning that "adulthood" in regard to those activities begins earlier. Yet, As Dr. Steinberg explains:

> [t]o the extent that we wish to rely on developmental neuroscience to inform where we draw age boundaries between adolescence and adulthood for purposes of social policy, it is important to match the policy question with the right science. . . . For example, although the [American Psychological Association] was criticized for apparent inconsistency in its positions on adolescents' abortion rights and the juvenile death penalty, it is entirely possible for adolescents to be too immature to face the death penalty but mature enough to make autonomous abortion decisions, because the circumstances under which individuals make medical decisions and commit crimes are very different and make different sorts of demands on individuals' abilities.

Laurence Steinberg, *Should the Science of Adolescent Brain Development Inform Public Policy?*, 64 AM. PSYCHOLOGIST 739, 744 (2009); *cf. Roper*, 543 U.S. at 620 (O'Connor, J., dissenting) (questioning why the age for abortion without parental involvement "should be any different" given that it is a "more complex decision for a young person than whether to kill an innocent person in cold blood").

Consistent with Dr. Steinberg's findings, characteristics related to impulse control and susceptibility to peer pressure, which are specifically relevant to criminal offending, take longer to develop. *See, e.g.*, Alexandra O. Cohen et al., *When Does a Juvenile Become an Adult? Implications for Law and Policy*, 88 TEMPLE L. REV. 769, 786-87 (2016) (defining "young adulthood" at 21 for purposes of cognitive capacity and the ability for "overriding emotionally triggered actions," and finding that 21 is the "appropriate age cutoff[ ] relevant to policy judgments relating to risk-taking, accountability, and punishment").

Because the various regions of the brain reach full development at different ages, no one definition of adulthood can be established; rather, adult maturity is dependent upon the context and tasks relevant to the inquiry. Although young adults are mature enough to undertake activities requiring informed, reasoned decision making, those same capabilities do not extend to actions that are the result of sudden impulses and peer pressure.

B. National Policy And Practice Evinces A Clear Consensus That The Death Penalty Should Not Be Imposed On Individuals Under Age 21 At The Time Of Their Offense

1. The American Bar Association has condemned the execution of young adults

Earlier this year, the American Bar Association passed a resolution urging states that have the death penalty to refrain from imposing it on young people who were under 21 at the time of their offense. *See* ABA Resolution 111: Death Penalty Due Process Review Project Section of Civil Rights and Social Justice, Report to the House of Delegates, https://www.americanbar.org/content/dam/aba/images/abanews/mym2018res/111.pdf. [hereinafter ABA Resolution 111]. The ABA's policy relied heavily on scientific research regarding the "newly-understood similarities between juvenile and late adolescent brains."[1] As explained by ABA Resolution 111, because the death penalty is the most severe and irrevocable sanction available, it should only be imposed on the most blameworthy defendants who have committed the worst crimes. *Id.* at 11. The ABA relied on this research to conclude that young adults "share a lesser moral culpability with their teenage counterparts," insufficient to justify imposition of the death penalty. *Id.*

[1] The ABA defines "late adolescence" as individuals age 18 to 21 years old. *See* ABA Resolution 111 at 2.

2. The same considerations relied upon by the Supreme Court in *Roper, Graham*, and *Miller* to draw the line at eighteen for adult sentencing have now propelled many states to set the age of adulthood at 21 for the exercise of adult rights and responsibilities

In striking the death penalty for children, the Supreme Court also considered where states drew the line "between childhood and adulthood" for "many purposes" outside the context of the death penalty and noted that many states drew that line at eighteen. *Roper*, 543 U.S. at 574. Since then, many states have re-examined the appropriate age for the exercise of various adult rights and responsibilities and, looking to the developmental attributes identified in *Roper* and other juvenile sentencing cases, amended or passed new legislation raising the age of adulthood to twenty-one.

For example, many states and municipalities have raised the age for purchasing tobacco—one of the four primary legislative comparisons noted in *Roper*—from 18 to 21. *See, e.g.*, N.Y.C. ADMINISTRATIVE CODE § 17-706 (McKinney 2018); CAL. PENAL CODE § 308 (West 2018) and CAL. BUS. & PROF. CODE § 22963 (West 2016); HAW. REV. STAT. ANN. § 712-1258 (West 2016); CHI., ILL., CODE OF ORDINANCES § 4-64-345 (2017); KANSAS CITY, MO., CODE OF ORDINANCES § 50-253 (2017); ST. LOUIS COUNTY, MO., CODE OF ORDINANCES § 602.367 (2017); CLEVELAND, OHIO, CODE OF ORDINANCES § 607.15 (2016). *See also* Campaign for Tobacco Free Kids, *State and Localities that Have Raised the Minimum Legal Sale Age for Tobacco Products to 21*, https://www.tobaccofreekids.org/assets/content/what_we_do/state_local_issues/sales_21/states_localities_MLSA_21.pdf.

Similarly, all fifty states require an individual to be 21 to purchase alcohol. *See* National Minimum Drinking Age Act, 23 U.S.C.A. § 158 (West 1984). The corresponding federal legislative history affirms that 21 was chosen out of for their propensity for reckless

activities such as drinking and driving. *National Minimum Drinking Age: Hearing on H.R. 4892 Before the Subcomm. on Alcoholism and Drug Abuse of the S. Comm. on Labor and Human Resources*, 98th Cong. 48 (1984).

The same rationale underpinning these restrictions for young people under 21 has also led states to update laws in many other areas. For example, since *Roper*, 25 states, prompted in part by federal guidance,[2] have extended the age at which young people can remain in foster care to age 21. *See Extending Foster Care Beyond 18*, NATIONAL CONFERENCE OF STATE LEGISLATURES (July 28, 2017), http://www.ncsl.org/research/human-services/extending-foster-care-to-18.aspx. The spread of this legislation is based on the notion that young people may not be prepared for independent living at 18, when their character is not yet fully formed and when propensity for risky behavior still exists. *See* Miriam Aroni Krinsky & Theo Liebmann, *Charting a Better Future for Transitioning Foster Youth: Executive Summary of Report From a National Summit on the Fostering Connections to Success Act*, 49 FAM. CT. REV. 292, 292 (2011) ("These studies confirm the wisdom of embracing policies and practices that can lengthen the window of support for these vulnerable and at-risk youth"); *cf. Roper*, 543 U.S. at 570 (identifying as a salient characteristic of youth an individual's "vulnerability and comparative lack of control over their immediate surroundings").

In keeping with this trend, specialty courts have been created across the country targeted specifically at young adults ages 18 to 21, *see* CONNIE HAYEK, U.S. DEPARTMENT

[2] Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351) Sec. 201 (continuing federal support for children in foster care after 18 based on evidence that youth who remain in foster care until 21 have better outcomes when they ultimately exit the foster care system); and Sec. 202 (requiring child welfare agencies to help youth at 18, 19, 20, and 21 plan for their transition to independence from the foster care system).

OF JUSTICE, NATIONAL INSTITUTE OF JUSTICE, ENVIRONMENTAL SCAN OF DEVELOPMENTALLY APPROPRIATE CRIMINAL JUSTICE RESPONSES TO JUSTICE-INVOLVED YOUNG ADULTS 6 (2016),[3] and states have adopted "youthful offender" laws awarding a hybrid of special protections to individuals 18-21.[4] These courts are hybrd juvenile/adult courts that provide accountability for young adults in the criminal justice system but also provide resources and protections necessary for the unique developmental needs of young adults. *See, e.g.*, Young Adult Court, THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO, https://www.sfsuperiorcourt.org/divisions/collaborative/yac; Tim Requarth, *A California Court for Young Adults Calls on Science*, N.Y. TIMES, Apr. 17, 2017, https://www.nytimes.com/2017/04/17/health/young-adult-court-san-francisco-california-neuroscience.html. Similarly, youthful offender laws may protect young people from the harshest penalties of the criminal justice system, even when they are not afforded the protections of the juvenile justice system.

These developments reflect this evolving understanding regarding the line between childhood and adulthood. Viewed alongside recent scientific research demonstrating the ongoing development of the young adult brain, these laws support exempting young adults 18-21 from imposition of the death penalty.

3. State sentencing practices demonstrate a trend toward abolishing the death penalty and other severe sentences for young adults under age 21

In banning the juvenile death penalty in *Roper*, the Court relied upon data showing that the majority of states banned the execution of juveniles and that, even where permitted, few states actually imposed the death penalty on individuals under 18. Similar patterns can

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[3] *Available at* https://www.ncjrs.gov/pdffiles1/nij/249902.pdf.
[4] *See, e.g.*, MICH. COMP. LAWS ANN. § 762.11 (West 2015).

now be seen regarding application of the death penalty to individuals between the ages of 18 and 21. Executions of young adults who were 18, 19, or 20 at the time of their offenses "are rare and occur in just a few states." Brian Eschels, *Data & the Death Penalty: Exploring the Question of National Consensus Against Executing Emerging Adults in Conversation with Andrew Michaels' A Decent Proposal: Exempting Eighteen- to Twenty-Year-Old's From the Death Penalty*, 40 N.Y.U. REV. L. & SOC. CHANGE 147, 152 (2016). Of the twenty-eight states that executed at least one adult between 2001 to 2015, only fifteen states executed anyone between 18 and 20. *Id.* During these years, only 130 young adults were executed, compared to 730 people (excluding pre-*Roper* juveniles) executed in total. *Id.* Further, 77.69% of these young people were executed in just four states—Texas, Oklahoma, Virginia, and Ohio. *Id.*

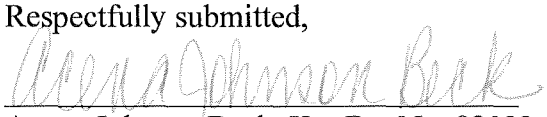
The limited application of the death penalty to young adults is buttressed by recent state court decisions that have barred the imposition of harsh mandatory sentences on young people over eighteen. For example, an Illinois court held that the imposition of a mandatory life sentence was unconstitutional as applied to a 19-year-old defendant under the proportionate penalties clause of the Illinois Constitution and extended the protections of *Miller* to this population. *People v. House*, 72 N.E.3d 357, 389 (Ill. App. 1st Dist. 2015). The Court specifically relied upon the shared neurological and behavioral attributes between adolescents and young adults in ruling these sentences unconstitutional for offenders 18-21. *Id.* at 388-89. Similarly, the Washington Supreme Court barred application of the state's mandatory minimum sentencing provisions to a defendant over age 18. *State v. O'Dell*, 358 P.3d 359, 366 (Wash. 2015) (en banc). The Court held that the defendant's youthfulness could be a mitigating factor justifying a sentence below the

standard sentencing range even when defendant is over 18, in part because brain development involving behavior control continues to develop into a person's 20s. *Id.* at 364-66. These decisions are further evidence of the trend toward extending constitutional sentencing protections to young adults 18-21 years old.

CONCLUSION

For the foregoing reasons, *Amici Curiae* respectfully request that this Court affirm the trial court decision holding the Kentucky death penalty statute unconstitutional for young adults under 21.

Respectfully submitted,



Acena Johnson Beck, Ky. Bar No. 92022
Children's Law Center, Inc.
1002 Russell Street
Covington, KY 41011
Tel: 859-431-3313
Fax: 859-655-7553
abeck@childrenslawky.org

Marsha L. Levick, PH14815511
JUVENILE LAW CENTER
1315 Walnut St., 4th Floor
Philadelphia, PA 19107
Tel: (215) 625-0551
Fax: (215) 625-2808
mlevick@jlc.org

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