I. POSITION OF AMICI

The Juvenile Law Center, Legal Services for Children the National Center for Youth Law and Legal Advocates for Children and Youth respectfully submit as amici curiae in support of the minor that the juvenile court erred it its conclusion that George T.'s actions constituted a criminal threat within the meaning of Penal Code Section 422. Amici additionally submit that, by subjecting George T. to criminal penalties for his actions, the Court denied George T. his First Amendment right to free expression.

II. INTEREST OF AMICI CURIAE

The question presented to this Court is of great significance to each of the amici organizations.

Juvenile Law Center (JLC) ensures that the child welfare, juvenile justice and other public systems provide vulnerable children with the protection and services they need to become happy, healthy and productive adults. Founded in 1975 as a non-profit legal service, JLC is one of the oldest children's rights organizations in the United States. JLC has always maintained a core mission of protecting and advancing children's rights. The center does this by ensuring that children are treated fairly by systems that are supposed to help them, and that children receive the treatment and services that these systems are supposed to provide. JLC believes that justice can be promoted by procedural safeguards,

which help ensure that decisions about children are better informed, more accurate and most appropriate. JLC is particularly concerned that the juvenile justice and child welfare systems be used only when necessary, and that children who are served by those systems receive adequate education, and physical and mental health care.

Legal Services for Children ("LSC") was founded in 1975 as the first non-profit law firm established to provide free direct legal and social services to children and youth. LSC represents youth in dependency, guardianship, school expulsion, immigration and other cases. LSC uses attorney-social worker teams to assist at-risk youth in the Bay Area who need to access the legal system to stabilize or improve their lives. LSC's mission is to empower youth by increasing their active participation in making decisions about their own lives. LSC works directly with youth involved in, or at risk of involvement in the juvenile justice system. LSC is also the host organization for the Pacific Juvenile Defender Center. The Defender Center provides support, training and technical assistance for juvenile defenders throughout California and Hawaii. It is the mission of the Defender Center to improve the quality of juvenile defense in our region and ensure that juveniles are provided with holistic representation that meets their needs.

Legal Advocates for Children & Youth ("LACY") is one of five programs of the Law Foundation of Silicon Valley (Law Foundation).

LACY is the only program of its kind in Santa Clara County, providing for the legal needs of children and youth. Currently, LACY has three components. First, it provides free legal services to children and youth throughout Santa Clara County through direct representation and advocacy by LACY staff and through recruiting, training, and coordinating a panel of volunteer attorneys. Specifically, LACY provides legal services regarding guardianships, emancipation, education law, and juvenile dependency, and services to pregnant and parenting teens and homeless and runaway youth. Second, it addresses systemic problems that place unnecessary obstacles in the paths of young people seeking assistance. Third, it serves as a community resource by providing information, referrals, and training to other community-based organizations that work with youth, and by educating youth, teachers, parents, and service providers through presentations.

The National Center for Youth Law ("NCYL") is a private, non-profit legal organization devoted to improving the lives of poor children in the United States. For more than 25 years, NCYL has provided support services to child advocates nationwide and direct representation in cases involving child welfare, public benefits for children and their families, legal issues involving child and adolescent health, fair housing for families with children, and juvenile justice.

III. INTRODUCTION

The juvenile court found that George T.'s action of writing and giving to two fellow students a poem constituted a criminal threat, under Penal Code Section 422. Amici agree with the analysis in the minor's brief that George T.'s actions did not constitute a criminal threat under the meaning of the statute and the criminal sanctions he received violated his right to free expression under the First Amendment. As advocates for children and youth, we are particularly concerned about several issues this case raises. First, the determination that George T.'s actions constituted a criminal threat failed to take into account normal adolescent development and thought processes. Second, the First Amendment issue raised in this case is of particular significance because of the importance for adolescents of having the ability to express their thoughts and feelings. The juvenile court's decision sanctions criminal punishment for written expression of angry emotions, which mental health professionals hail as a way to avoid physical violence. Third, the juvenile court's analysis of what constituted a reasonable threat of harm may have been influenced by a mistaken perception regarding school violence that is not supported by the research in this area. Finally, this case exemplifies a disturbing trend to criminalize behavior that is more appropriately handled at the school level. Many schools have been quick to turn to law enforcement due to highly publicized cases of school violence. Research shows that this

practice has a disproportionate effect on children of color. The best way to ensure both safety and fairness in our schools is to offer interventions, such as mental health services, when youth, like George T., cry out for help.

IV DISCUSSION

A. The Juvenile Court failed to consider adolescent thought processes

To criminally punish an adolescent for verbal expression often fails to take into account the child's stage of cognitive and moral development, thereby reading into a young mind a criminal intent where it does not exist. Psychologists who work with adolescents recognize that their thought processes are different from those of adults.[1] One area in which adolescents have not fully developed is in their ability to anticipate consequences. Adolescents are often unable to consider the worst that could happen.[2]

> Adolescents often do not plan or do not follow their plan and get caught up in unanticipated events that happen to them. Their thinking is present-oriented. Time and boundaries are more fluid than with adults. Often they are surprised by outcomes, saying, 'It happened so fast, I couldn't think.' They usually view as

---

[1] Beyer, *Recognizing the Child in the Delinquent* (1999) 7 Ky. Child. Rts. J. 16, 17.

[2] Beyer, *What's Behind Behavior Matters: The Effects of Disabilities, Trauma and Immaturity on Juvenile Intent and Ability to Assist Counsel* (2001) Guild Practitioner 58:2, 112, 117

'accidental' the unintended consequences of actions that adults would have predicted."[3]

Dr. Marty Beyer, a clinical psychologist and independent consultant with a PhD from Yale University, is an expert on how a young person's cognitive, moral and identity development and trauma affects his or her behavior and culpability. She considers an example of a juvenile whose immature thinking led to his offense, [4] a minor who has been picked on for being different at school hears another classmate insult his mother and responds by threatening the classmate. He is reported to the principal and charges are brought against him. Dr. Beyer assesses the minor's intent as follows: "He reacted reflexively without any thought, plan or intention, which is not surprising given his simplistic thought processes at his age [13 years old]."[5] Dr. Beyer continues: "J does not think the students who heard his threat thought he was serious or were hurt or fearful because of it."[6]

Similarly, the minor in this case stated that he did not intend the poem to be a threat and was just trying to joke around when he gave it to the alleged victims, girls he thought were his friends. (RT 233-234). He testified that he and other students would joke around about being "the next Columbine kid" but that they meant it as only a joke. (RT 233-34).

---

[3] Beyer, *supra,* 7 Ky. Child. Rts. J. at 17.
[4] Beyer, *supra,* Guild Practitioner 58:2 at 119-20.
[5] Beyer, *supra,* Guild Practitioner 58:2 at 119.
[6] Beyer, *supra,* Guild Practitioner 58:2 at 120.

He explained that he wrote the phrase "Dark Poetry" at the top of the poem to indicate that it was just an expression of his feelings and not a serious threat. (RT 296). He stated that he wrote the poem on a bad day when a bunch of thoughts he did not like came into his head and he put them down on paper as a way of getting them out of his head. (RT 233). Finally, he stated that he assumed the alleged victims would understand that he was only joking when he gave them the poem. (RT 231). Although the minor may have admitted on cross-examination that he could see why a person might perceive as threatening a stranger coming up to the person and saying he was going to be the next school shooter, he did not think at the time that handing this "dark poetry" to his classmates would be looked at as a serious threat. This is a typical adolescent thought process.

B. The Juvenile Court wrongly criminalized George T. for using poetry to express his unpleasant emotions rather than acting on them

"First Amendment rights, applied in light of the special characteristics of the school environment, are available to teachers and students. It can hardly be argued that either students or teachers shed their constitutional rights to freedom of speech or expression at the schoolhouse gate. This has been the unmistakable holding of this Court for almost 50 years." *Tinker v. Des Moines Independent Community School Dist(1969)* 393 U.S. 503, 506,89 S.Ct. 733, 736. The Supreme

Court recognized that adolescents, like adults, have First Amendment protection. In fact, the right to free expression is especially critical to adolescents because expression of their emotions is such an important part of their development.

Anger is a normal emotion; everyone experiences it. Adolescents, particularly boys, often have difficulty expressing their anger in appropriate ways. In fact, studies have shown that boys—whether due to biology or culture—are generally less able than girls to express their emotions verbally, and that this inability results in higher rates of aggression and delinquency.[7] William Pollack, the author of *Real Boys* and an assistant professor of clinical psychology at Harvard Medical School, calls this the "Boy Code," a culture that encourages boys to keep their feelings to themselves regardless of consequences.[8]

Mental health professionals believe that adolescents can be steered away from violent behavior, however, by improving their ability to think, talk about and express their feelings, rather than act upon them. Dan Kindlon and Michael Thompson, the authors of *Raising Cain: Protecting*

---

[7] Bruce and Davis, *Slam: Hip-hop Meets Poetry—A Strategy for Violence Intervention* (2000) English Journal, National Council of Teachers of English at 120, citing Kindlon, and Thompson, Raising Cain: Protecting the Emotional Life of Boys (1999) p. 275.

[8] Udesky, *Depression and Violence in Teens* (2001) http://www.ahealthyme.com/topic/depteen

the Emotional Life of Boys, have worked with boys who have problems with anger and aggression.

> Their work involves helping clients understand their emotional lives and develop an emotional vocabulary in order to increase their clarity about their feelings and those of others—recognizing them, naming them, and learning where they come from. Using words to talk about feelings releases emotional pressure and weakens the grip of anger and hostility. Once anger is raised to a conscious level, it loses some of its power. These mental health professionals try to teach violent boys and men, who have spoken through their actions, linguistic avenues for identifying, expressing, and channeling their thoughts and emotions before they erupt violently.[9]

Pollack also suggests supporting youth in talking about their feelings, to show their pain, as a way of averting the violent behavior that results from pent-up feelings. "Some boys who can't cry, cry bullets," Pollack says.[10]

Mental health professionals and others who work with youth encourage youth to express their feelings. Experts advise youth to re-direct their anger by, among other things, "writ[ing] it down—in any form—poetry or a journal, for example," and "draw[ing] it—scribble doodle, or sketch your angry feelings using strong color or lines."[11] Some

---

[9] Bruce and Davis, *supra* at 120, citing Kindlon and Thompson *supra* at 238.
[10] Udesky, *supra*.
[11] The Nemours Foundation *How Can I Deal with My Anger? TeensHealth* <http://www.kidshealth.org/teen/question/emotions/deal_with_anger.html >

teachers have started poetry and creative writing clubs in their schools as a way to help students work through their feelings, including those of depression, anger, alienation and hopelessness.[12]

The poem(s) written by George T. in this case demonstrate that he was experiencing feelings of angst and anger. Poetry was his method of expressing such feelings. He testified that he wrote that poem to get bad thoughts out of his head and that he is interested in poetry, particularly as a way to express his emotions, rather than acting on them. (RT 227). This method of handling anger has been praised by mental health professionals who work with adolescents around controlling their anger. Such professionals, who know that it is natural for teens to feel anger, might urge a young person to express his feelings on paper. The adjudication under Section 422 punishes George T. for doing just that. George T. is being criminalized for expressing unpleasant feelings through poetry and sharing them with his classmates, something other students do with the blessing and organization of their high school English departments as a way to combat violence.

The United States Supreme Court recognized the latitude that must be given the expression of unpleasant ideas or thoughts when it explained that "undifferentiated fear or apprehension of disturbance is not enough to

---

[12] *Slam: Hip-hop Meets Poetry* and Natell *Diverse in Verse* Metroland Online Vol. 25, No. 21.

overcome the right to freedom of expression." (*Tinker*, *supra,* 393 U.S. at 509, 89 S.Ct. at 737). The juvenile court failed to recognize this principle or the importance of free speech for an adolescent. The Court must not give less first amendment protection to a piece of written expression just because the thoughts expressed are unpleasant or angry. In fact, it is the expression of angry emotions that most need protection so that young people will have a non-violent outlet for the complicated and often frightening emotions that are a common part of adolescence.

C. The trial court's analysis may have been influenced by a misconception that schools are increasingly violent; the evidence shows that schools are among the safest places to be.

America's schools are among the safest places to be on a day-to-day basis. By virtually every measure, all types of school crimes are declining. From 1992 to 2002, nationally, nonfatal crimes against students dropped by 21 percent; for the same period serious violent crimes, including rape, sexual assault, robbery and aggravated assault, declined 43 percent. See Browne, *Derailed: The Schoolhouse to Jailhouse Track* (May 2003) The Advancement Project[13]. Student reports of physical fights on and off school grounds have decreased throughout the last decade, as have the number of students reported as having brought a gun to school. See Brener, et. al., *Recent Trends in Violence Related*

[13] Publication available online at www.advancementproject.org

Behaviors Among High School Students (1999) 2112 JAMA. Although statistics evidence a slight increase in school based offenses in California over the last three years, this increase is largely attributable to more complete incident reporting than an actual increase in student victimization in schools. See California Department of Education, California Safe School Assessment: 2000-2001 Results (2002) p. 4[14]. Significantly, even with comprehensive new reporting requirements, the number of firearms found on California public school campuses dropped almost 20 percent in the last year alone, and there were no reported student homicides in California public schools in the 2001-2002 school year. See California Assessment, p. 2; See also The National School Safety Center's Report on School Associated Violent Deaths[15] (May 2003).

More broadly, the latest national statistics on juvenile crime indicate that there has been a continuing decline in the rate and number of youth arrested for serious offenses since 1993. See Snyder & Sigmund, Washington, D.C.: Office of Juvenile Justice and Delinquency Prevention, Juvenile Offenders and Victims: 1999 National Report (1999) p. 62. Juvenile homicide arrests, in particular, have dropped 56 percent

[14] Publication available at www.cde.ca.gov.
[15] Report available at www.nssc1.org.

from 1993 through 1999. See id. All totaled, there has been a thirty percent drop in the total juvenile crime rate. Id.

By way of comparison, over 98 percent of the children who die each year from gunfire were shot and killed away from school. See Small and Tetrick, *School Violence: An Overview* (2002) Juv. Justice J., Vol. 8, number 1. Students ages twelve through eighteen are twice as likely to be victims of nonfatal serious violent crimes (that is, rape, sexual assault, robbery, and aggravated assault) away from school than on school grounds. See United States Department of Education, National Center for Education Statistics, Indicators of School Crime and Safety (November 2002).

These statistics notwithstanding, Americans increasingly perceive our schools as unsafe. There is a one in two million chance of being killed in schools, yet polls suggest that almost three-quarters of Americans think it is "likely" that a shooting will occur in their schools. Brooks, *School House Hype: Two Years Later* (April 2000) Washington, DC: Justice Policy Institute, Covington, KY: Children's Law Center 6[16]. There has been a thirty percent drop in youth crime, but almost two-thirds of Americans think it is on the rise. Id at 9. Sixty percent of high school students across the country believe that it is possible that a violent event on the scale of 1999's Columbine tragedy could happen at their school,

[16] Publication available at www.buildingblocks.org/publications/.

despite the fact that only 6 percent of students reported being a victim of any type of crime in school in 2001. See Department of Education Statistics, 2002.

A number of factors may account for this gap between perception and reality. Aggressive surveillance-type efforts to make schools safer have led to many "security focused" schools, including features like metal detectors, locked doors, and regular personal searches. Studies suggest that these efforts create an "unwelcoming, almost jail-like, heavily scrutinized environment" that makes children feel *less* safe. Mayer & Leone, *A Structural Analysis of School Violence and Disruption: Implications for Creating Safer Schools* (Aug. 1999) 22 Educ. and Treatment of Children. Also, isolated sensational incidents involving multiple victims in suburban schools have made what heretofore was perceived as an urban problem for poor and minority children a national issue for all parents.

Perhaps most significantly, the mass media plays a pivotal role in educating the public about violence in our schools, both in the state of California and nationwide. See Dorfman, *Youth and Violence on Local Television News in California* (Aug. 1997) 87 Am. J. of Public Health 1311-16. Understandably, the media has closely covered school shootings. However, media coverage has not generally sought to put those events in perspective. See Schwartz, *School Bells, Death Knells, and*

Body Counts: No Apocalypse Now (2000), 37 Hous. L .Rev. 1, 4[17]. As a result, the media has rendered Americans fearful of their young people, a fear not rationally related to a real threat of physical violence. It is this irrational fear that was deemed sufficient to render George T's adolescent creative writing expressions a criminal act by the lower courts, a fear not rationally related to the reality of California's relatively safe school environment.

D. The misconception about safety in our schools has led schools to criminalize even minor transgressions, when school safety could best be served by positive interventions.

Misconceptions regarding school violence, bolstered by a few highly publicized tragedies, are transforming school safety policies at the local, state, and national level. From "profiling"- through which students are targeted based on a list of characteristics deemed predictive of a tendency toward violence- to beefed up security measures such as metal detectors and video surveillance, to the use of "zero tolerance" policies, which impose severe sanctions for a variety of behavior, schools nationwide are adopting a bunker mentality that is creating a pipeline running straight from our public schools to the juvenile justice system.

---

[17] While juvenile homicides dropped 13% between 1990 and 1995, related network news coverage increased 240%. Dohrn, *"Look out Kid it's Something you Did: Zero Tolerance for Children,"* in Zero Tolerance: Resisting the Drive for Punishment in our Schools, Ayers, Dohrn, and Ayers, eds. New York: New Press, 90 (2002.)

Most of the "zero tolerance" policies began as a good faith effort to keep guns and drugs out of schools, based largely on the federal Gun Free Schools Act of 1994. See 20 U.S.C. § 7151. The policies adopt swift and determinate consequences for a variety of student behaviors, consequences that often include suspension or expulsion along with an immediate referral to juvenile court. Discretion, individual consideration, and *context* are all removed from the administration of school discipline. Gone is the day where "the playground scrap or kickball tussle is deemed a rite of passage best settled by a teacher who orders the combatants to their corners, hears out the warring sides and demands apologies and a handshake." Johnson, *Schools are cracking down on Misconduct*, New York Times (Dec. 1. 1999) at A1. Instead, heavy-handed measures, administered without discretion or judgment, prevail.

Several highly publicized cases have involved scenarios very similar to the one in this case, where creative works of students, unaccompanied by any violent or physically disruptive conduct, were used to support criminal charges against the child. For example, in Denton, Texas, around Halloween 1999, Christopher Beamon, a thirteen-year-old student seventh grader, was asked to write a horror story in his English class. He completed the assignment and received a perfect grade, plus extra credit for reading his story aloud in class. The story described shooting a teacher and two classmates, all of whom were referred to in the

story by name. Concerned that Christopher might cause some harm, the parents of the students named in the essay called the school's principal. School officials notified juvenile authorities, and the sheriff's deputies arrived to remove Christopher from school. Ultimately, the charges were dropped, but not before Christopher spent five days in juvenile detention. See, *e.g.*, Farley, *Texas Authorities Jail Student for School Assignment,* N.Y. Times (Nov. 4, 1999) at B1.

In Wisconsin, Douglas D., an eighth grade student, wrote a story describing how a student named "Dick" cut his teacher's head off with a machete after being kicked out of class by the teacher. See, *In the Interest of Douglas D.*, 626 N.W.2d 725, 730-732 (Wisc. 2001.) Douglas called the teacher "Mrs. C." In fact, Douglas wrote the story after he was removed from class by his teacher, who referred to herself as "Mrs. C." She interpreted the story as a threat, became frightened, and reported the incident to the assistant principal. Id. The assistant principal then spoke to Douglas, who apologized and stated that he did not intend the story to be a threat. Id. He was given a one-day suspension from school; and upon his return was transferred to a different English class. Id.

Approximately six weeks later, police filed a delinquency petition against Douglas, alleging that he had violated the disorderly conduct statute by making a "death threat" and engaging in "abusive conduct under circumstances in which the conduct tends to cause a disturbance."

Id. at 731. The juvenile court adjudicated Douglas delinquent, finding that he had communicated a "direct threat" to Mrs. C that provoked a disturbance and made Mrs. C "very upset." Id. His adjudication was reversed by the Wisconsin Supreme Court, which held that Douglas's short story was not a "true threat" and therefore insufficient to establish a criminal offense. The Court also emphasized that the role of school discipline should be carried out by the schools rather than the juvenile court[18]. Id. at 743.

As these examples demonstrate, a particularly troubling aspect of rigid "get tough" approaches is that they are turning our children's creative works into criminal acts, with the responsibility for dealing with problem behavior in schools now being handed off to an increasingly punitive criminal justice system. The loss of discretionary "on-the-spot" conflict resolution is a lost opportunity to teach children about respect, to

[18] For further examples of courts differentiating school discipline concerns with criminal conduct, see *In re Julio L.*, 3P.3d 383 (Ariz. 2002) (en banc) (Dismissing disorderly conduct adjudication of middle school student, emphasizing that, "Our laws do not make criminals out of adults or juveniles just because they act offensively or rudely or lack respect and control. . . . We are, off course, quite aware that the schools need the support of our legal system… .(H)owever, we cannot equate a child's acting out through cursing or through angry or defiant words or actions with conduct proscribed by the criminal statute); *In re Paul M.*, 7 P.3d 131 (Az. App. 2000) (Dismissing "abuse of a school teacher" adjudication, explaining, "(t)hat the minor's behavior was inappropriate and thoroughly offensive is beyond dispute, as is the school's unquestioned right to impose such disciplinary consequences as the five-day suspension from school," but concluding that the behavior did not amount to a delinquent act.)

connect with the emotional experiences of adolescents, and to inspire trust of authority figures. It also means that schools are less and less a positive socializing force in students' lives, and more and more appendages of the juvenile justice system. Criminalizing youthful misbehavior in schools may have been less of a problem when juvenile courts adhered to a rehabilitative model. However, as explained more fully below, the stakes of transfer to juvenile court in California continue to rise as the environment is increasingly punitive in its approach, making juvenile court ill-suited to address the behavior ordinarily handled by the schools themselves.

E. Youth of Color are Disproportionately Victimized by the over-criminalization of school offenses.

The transfer of school discipline problems to the juvenile court occurs disproportionately when the youth in question is non-white, with black students taking the brunt of zero-tolerance policies. A recently released report by the Advancement Project found that, "regardless of whether a black student were (sic) in elementary, middle or high school, he or she was more likely to be suspended than his/her white peers." See *Derailed*, supra, at 33. This report is consistent with a significant body of research demonstrating that when an offense is subjective in its nature, such as "disruptive behavior," "disobedience," or "insubordination," a black student is much more likely to be sent to higher authorities,

including school administrators, principal's offices, and juvenile courts, for his conduct and more likely to be removed from the school for his conduct[19].

This research evidences a willingness to allow increasingly harsh school discipline policies to be enforced, in part, based upon racial stereotyping. In cases such as the one before the court, where a teacher's or student's "fear" is a necessary element of the offense, treating student expression as "terroristic threats" or "disorderly conduct" must be done with extreme caution, ensuring that authorities are not reinforcing a notion that teachers and peers are legitimate in fearing students of color. Schools, a primary line of defense in breaking down racial stereotypes and teaching youth the importance of a color-blind society, risk becoming

---

[19] See, e.g., Gordon, Della Piana, & Keleher, *Facing the Consequences: An Examination of Racial Discrimination in U.S. Public Schools,* (March 2000) Applied Research Center. (Finding an overrepresentation of youth of color in suspension and expulsion proceedings stemming from "zero tolerance" policies, noting that subjective offense conduct was more often deemed threatening when the student was black or Latino.); *Zero Tolerance Policies and Their Impact on Michigan Students* (January, 2003) Michigan Public Policy Initiative, pp.6-8 (Finding that youth of color are disproportionately expelled and suspended under Michigan's zero tolerance policies.); Zweifler & De Beers, *The Children Left Behind: How Zero Tolerance Impacts our Most Vulnerable Youth*, Mich. J of Race & Law, Vol. 8, pp. 191-220 (Describing the subjective role race plays in school discipline proceedings and outlining the significant cost these policies exact on society); Richart, Brooks, & Soler, *Unintended Consequences: The Impact of "Zero Tolerance" and Other Exclusionary Policies on Kentucky Students* (February 2003) Building Blocks for Youth. (Finding that zero tolerance policies in Kentucky led to the disproportionate exclusion of youth of color from schools, through both suspensions and expulsions.)

environments that entrench racial inequality and rob students of color the opportunity to receive the education necessary to become happy, productive adults.

V. CONCLUSION

The juvenile court's decision in this case is significant in that it sends a dangerous message to schools that they should not intervene or respond to a cry for help, but should instead relinquish their responsibility to law enforcement. It sends a dangerous message to young people that they it is not alright to express their emotions of anger in a safe way, such as in writing. Children in the United States are told as toddlers to "use their words." Adolescents who use their words to express anger and anxiety should be given help, not jail time. The adjudication should be reversed.

Respectfully Submitted,

Marsha Levick (PA Attorney ID: #22535)
Suzanne Meiners (PA Attorney ID: #89500)
Juvenile Law Center
The Philadelphia Building
1315 Walnut Street, 4th Floor
Philadelphia, PA 19107

Abigail Trillin (CA State Bar # 179052
Sarah Colby (CA State Bar # 194475)
Legal Services for Children
Pacific Juvenile Defender Center
1254 Market Street, 3rd Floor
San Francisco, CA 94102

by _____
Abigail Trillin
Managing Attorney, Legal Services for Children
Co-Director, Pacific Juvenile Defender Center

WORD COUNT CERTIFICATION
(Cal. Rules of Court, rule 14(c)(1))

The text of this brief consists of 4,445 words, as counted by the Microsoft Word word-processing program used to generate the brief.

_____ _____

Abigail Trillin (State Bar #179052) Dated