

Juvenile Curfews and Race: A Cautionary Note

J. David Hirschel

University of Massachusetts–Lowell

Charles W. Dean

University of North Carolina–Charlotte

Doris Dumond

University of Massachusetts–Lowell

During the 1990s, the United States experienced a rise in the popularity of nocturnal juvenile curfews as a method of crime prevention. Prior research has not, however, found curfews to be particularly effective in achieving their goals, and concerns have been raised about discriminatory enforcement. In this article we examine the implementation of a juvenile curfew in a large southern city, Charlotte, North Carolina, and investigate its impact on different racial groups. The background characteristics of curfew violators were found to mirror those of juvenile offenders in general, and different types of violators were cited in different areas of town. However, although the curfew had a positive or at least a neutral effect on some offenders, it had an escalation effect on Asian and Hispanic youth. The policy implications of the findings are discussed.

A number of times in our nation's history, we have responded to juvenile crime by implementing a nocturnal curfew requiring youth to be off the streets and back in their homes by a designated time. Now, again in the 1990s, we have seen a resurgence in the popularity of juvenile curfews. Most American cities with populations of 100,000 or more have curfews in effect (Ruefle & Reynolds, 1995, 1996).

There are the following two major objectives behind the implementation of juvenile curfews: (a) to reduce the amount of juvenile crime and (b) to decrease the extent of juvenile victimization occasioned by juveniles being out on the streets late at night.

Prior research on juvenile curfews has questioned their effectiveness. Although concerns have been raised about the potential discriminatory enforcement and the differential impact of curfews on racial groups, these

issues have not been prominently featured in prior research. In this article we examine the implementation of a juvenile curfew in a large southern city, Charlotte, North Carolina, and investigate its impact on different racial groups.

PRIOR RESEARCH

In the past 100 years, there have been several eras in which nocturnal juvenile curfews have been popular as a means of responding to juvenile crime in the United States (Ruefle & Reynolds, 1996). From the late 1880s to the end of the 19th century, as many as 3,000 municipalities implemented curfews (Note, 1958). However, by the early 1900s, the curfew movement had lost its appeal as a means of crime control for juveniles. Reappearing in the 1940s and the 1970s, juvenile curfews again became popular as a response to the rising levels of juvenile crime. During the 1990s, the nature of crimes committed by juveniles underwent a fundamental change, with youth committing more serious and more violent offenses than in the past (Crowell, 1996). As a result of this alarming trend, the nation once again experienced an increase in the popularity of juvenile curfew policies (Conference of Mayors, 1997). Most American cities with populations of 100,000 or more—151 of 200 surveyed—now have curfews in effect (Ruefle & Reynolds, 1995, 1996).

Anecdotal reports on curfews have all tended to be positive (Click, 1994; Garrett & Brewster, 1994; LeBoeuf, 1996); but, these reports have not been subjected to the scrutiny of scientific examination. Despite the lack of demonstrated effectiveness, there has been a national increase in the implementation of juvenile curfews, and it is likely that curfews will continue to be used (Conference of Mayors, 1997; Ruefle & Reynolds, 1996). Only six systematic empirical studies testing the efficacy of the curfew have been conducted (Fritsch, Caeti, & Taylor, 1999; Hunt & Weiner, 1977; Males & Macallair, 1998, 1999; Reynolds, 1997; Reynolds, Seydlitz, & Jenkins, 2000; Slavick & Aos, 1996; and Wright, Hurst, Sundt, & Latessa, 1994a, 1994b), and their results have been almost uniformly disappointing. There appears to be little to no effect on the overall juvenile crime rate. Although a modest reduction in juvenile crime during curfew hours has been observed, there has been a corresponding temporal displacement of juvenile crime to noncurfew hours. In some locations, juvenile crime rates have actually risen as a result of the increased opportunity afforded juveniles during less crime-prone time periods to commit offenses against unsuspecting victims and less guarded inanimate targets.

Hunt & Weiner (1977) examined the impact of a 10 p.m. to 6 a.m. curfew in Detroit in August 1976 and found a 3% to 6% reduction in criminal activity during curfew hours. However, a displacement had occurred, with criminal activity increasing 3% to 6% between 2 p.m. and 4 p.m. Likewise, when Wright et al. (1994b) analyzed arrest data for July 1993 through September 1993 and compared those data with figures for July 1994 through September 1994—when a curfew went in effect in Cincinnati, Ohio—they found that the curfew did reduce the proportion of arrests during the curfew hours (between 12% and 14%). However, there was no overall reduction in juvenile arrests over the 3-month test period. In fact, while in the first month of the curfew, July 1994, there was a minor reduction in arrests; in the following 2 months, August to September 1994, arrests more than doubled, so that by the end of the 3-month test period there was a 46% increase in arrests for both White and African American youth, with a 16.5% increase in arrests for the four index-one offenses examined (robbery, aggravated assault, burglary, and larceny). The increase in crime during noncurfew hours was significant.¹ Wright et al. (1994b) noted, with great concern, that

The curfew—while designed to lower rates of victimization—has likely *increased* victimization by bringing together in time and space motivated offenders with more suitable and less guarded targets. (pp. 16-17)

In 1996, the Washington State Institute for Public Policy conducted a review of the juvenile curfew ordinances adopted by 27 cities in the state of Washington following the passage of enabling legislation in 1994 (Slavick & Aos, 1996). The respondents were city officials in the 27 communities, which represented about 10% of the total population of the state. These officials were questioned about their experiences with the curfew ordinances. It was made very clear to them that the study did not seek to conduct an independent statistical analysis to ascertain the efficacy of juvenile curfews in curtailing juvenile crime (Slavick & Aos, 1996, p. 3).

City officials in 13 out of the 27 cities reported that they felt that the juvenile curfews “had an impact on juvenile crime” (Slavick & Aos, 1996, p. 4). In addition, three cities did perform statistical analyses of the impact, and reported decreases in juvenile crime, which ranged from 30%—Tacoma—to 68%—Yelm (Slavick & Aos, 1996, p. 4). However, these statistical evaluations were generally confined to a 1-year period, which may not have been sufficient to observe the reported “decay” phenomenon seen in other studies (Hunt & Weiner, 1977; Reynolds, 1997; Wright et al., 1994b).

A study undertaken by Males and Macallair (1998) examined the impact of juvenile curfew laws in California. The following three sets of aggregated data were used: (a) statewide curfew arrest rates and six types of crime juvenile arrest rates by racial groups for 1978 through 1996; (b) county curfew arrest rates and youth crime rates for the state's 12 most populous counties (totaling 22 million in population in 1995 and 90% of the state's arrests) for 1980 through 1996; and (c) local curfew and youth felony and burglary crime rates for all cities over 100,000 (21 cities) in Los Angeles and Orange counties.

The results were overwhelmingly disappointing. Analysis of the three data sources provided "no support for the proposition that stricter curfew enforcement reduces youth crime" (Males & Macallair, 1998, p. 8). Most of the analyses showed no effect between stricter curfew enforcement and crime. In those few instances in which a significant effect was detected, it was more likely to be in the direction of increasing rather than decreasing crime. Overall, this study indicated that there was no foundation to endorse the notion that curfew laws are effective; and, "in many jurisdictions, serious juvenile crime increased at the very time officials were touting the crime reduction effects of strict curfew enforcement" (Males & Macallair, 1998, p. 15).

In a later time-series analysis of juvenile crime in California for the years 1980 through 1997, Males and Macallair (1999) confirmed the results of their 1998 study that there was no support for the hypothesis "that stricter curfew enforcement reduces youth crime or risk of violent fatality either absolutely or relative to adults, by location, by city, or by type of crime" (p. 8). When statistically significant results were observed, they indicated that stricter curfew enforcement was associated with increases in juvenile crime. In addition, this study made an important and disturbing finding: In four large California counties (Ventura, Fresno, Santa Clara, and Los Angeles), African American and Hispanic youth were disproportionately targeted for curfew arrests, and were more likely to be arrested.² Interestingly, this appearance of discriminatory application of juvenile curfews has not been observed nationally. *The Sourcebook of Criminal Justice Statistics 1998* (United States Department of Justice, 1999) notes that of the 128,183 persons under 18 years of age arrested for curfew and loitering law violations, less than 25% were people of color: 22.6% (28,998) were African American, 1.1% (1,532) American Indian, and 3.5% (1,714) Asian/Pacific Islander. Thus, these national data do not appear to confirm that curfew laws are being targeted at minorities in a discriminatory fashion.

Employing a quasi-experimental design with five target and four control areas, a recent study by Fritsh, Caeti, and Taylor (1999) examined the efficacy of the following three strategies: saturation patrol, aggressive curfew, and truancy enforcement in Dallas, Texas. This study found that aggressive curfew and truancy enforcement led to significant reductions in gang violence, whereas simple saturation patrol did not. There was a statistically significant decrease (57%) in gang-related activity in the target areas during the grant period. However, this was also observed in the control areas during the same period, but to a lesser degree (37% control vs. 57% target). A marked decrease in homicides involving juvenile victims (from 18 in the prior year to 7 during the initiative) and a drop in gang-related juvenile homicide victims (from 6 to 2), were also observed.

The most recently published empirical analysis of curfew laws was a study in New Orleans, Louisiana, conducted by Reynolds et al. (2000). Building on Reynolds' doctoral thesis (1997), and using an interrupted time-series analysis, the authors examined two sets of archival data (official victim reports and juvenile arrest data from the New Orleans Police Department) 1 year before the curfew went into effect (1993) through 1 year after its implementation (1995). Their results are consistent with previous studies: During curfew hours, the curfew law did not significantly reduce either juvenile victimizations or juvenile arrests, and juvenile arrests had no effect on crime. Though "violent victimizations of individuals of all ages during curfew hours and violent victimizations of juveniles during the noncurfew hours decreased abruptly," deterrence decay prevailed and violent victimizations increased after 1 year of the law's implementation (p. 218). On the whole, property victimizations increased significantly during both curfew and noncurfew hours. The authors concluded that

Juvenile curfew laws are ineffective for reducing crime because they do not include many of the perpetrators of crime, namely older adolescents and young adults; they do not include the hours juveniles are most likely to commit offenses; they are based on the incorrect assumption that police crackdowns reduce crime; and they do not fully utilize the theories and research concerning juvenile delinquency . . . [whose correlates include] exposure to delinquent peers, school, and the family. (p. 226)

The resurgence in popularity of curfews has contributed to a lively legal debate about their constitutionality (DeLucia, 1995; Hemmens & Bennett, 1999; Jordan, 1993; Kizer, 1997; Marketos, 1995; Scherr, 1992; Toth, 1994-1995). This debate has been complicated by the fact that the U.S.

Supreme Court has, to date, declined to hear a case involving juvenile curfews (the court has denied petitions for writs of certiorari in *Qutb v. Strauss*, 1994, and *Bykofsky v. Borough of Middletown*, 1976), and there appears to be no consensus among the decisions issued by lower federal and state courts in juvenile curfew cases.

Curfews have been attacked on a variety of grounds. These include challenges that curfews infringe on First Amendment rights of free speech, association, and assembly (*Bykofsky v. Borough of Middleton*, 1975; *Johnson v. City of Opelousas*, 1981; *McCollester v. City of Keene*, 1984; *Nunez v. City of San Diego*, 1997; *Qutb v. Strauss*, 1993; *Waters v. Barry*, 1989); the Fourth Amendment right against unreasonable search and seizure (*Qutb v. Strauss*, 1993; *Waters v. Barry*, 1989); and the Fourteenth Amendment equal-protection clause (*Bykofsky v. Borough of Middleton*, 1975; *Johnson v. City of Opelousas*, 1981; *McCollester v. City of Keene*, 1984; *Nunez v. City of San Diego*, 1997; *Qutb v. Strauss*, 1993; *Waters v. Barry*, 1989). Other challenges have included vagueness (*Bykofsky v. Borough of Middleton*, 1975; *Johnson v. City of Opelousas*, 1981; *Nunez v. City of San Diego*, 1997; *Qutb v. Strauss*, 1993), overbreadth (limiting of fundamental liberties when a less restrictive means may be applied): *Johnson v. City of Opelousas* (1981); *McCollester v. City of Keene*, 1984; *Nunez v. City of San Diego*, 1997; *Qutb v. Strauss*, 1993; *Waters v. Barry*, 1989; and the allegation that curfews infringe on parental rights to child rearing (*Bykofsky v. Borough of Middleton*, 1975; *Johnson v. City of Opelousas*, 1981; *Nunez v. City of San Diego*, 1997).

The specifics of the curfew ordinances examined in these cases have differed and, as Kizer notes, "The federal courts are split in their holdings" (1997, p. 756), with some courts invalidating and others upholding the ordinances. Although the lower courts provide considerable guidance on the constitutional parameters of curfews, the U.S. Supreme Court has still to rule definitively on any of the challenges raised in these cases.

METHOD

The current project was conducted in Charlotte, North Carolina. The 1995 official population estimate for the city was 581,466, the composition of the population approximately 70% White and 30% non-White (essentially African American: see "Facts about Charlotte-Mecklenburg," 2000). The Charlotte-Mecklenburg Police Department (CMPD) is the primary law enforcement agency operating within the city. The geographical area patrolled

by the CMPD is divided into the following four sectors called bureaus: Adam (essentially the west side of the city), Baker (the south), Charlie (the north and northeast), and David (the inner city).

Like other large cities, Charlotte, North Carolina, has a juvenile curfew in effect. Implemented in May 1995, the purpose of the Charlotte curfew ordinance is to "protect juveniles from victimization and exposure to criminal activity" (City of Charlotte Code, Art. VII, Sec. 15-145). The ordinance is also intended to

reinforce and promote the role of parent in raising and guiding children, and promote the health, safety, and welfare of both juveniles and adults by creating an environment offering better protection and security for all concerned. (City of Charlotte Code, Art. VII, Sec. 15-145)

Although the crime control aspect of the ordinance is mentioned, the primary focus of the ordinance, which significantly is entitled a "Youth Protection" ordinance (City of Charlotte Code, Art. VII, Sec. 15-145), is on promoting youth safety. This is to be accomplished by keeping youth under the age of 16 off the streets between the hours of 12:01 a.m. to 6 a.m. on Friday and Saturday nights, and 11 p.m. through 6 a.m. the rest of the week (City of Charlotte Code, Art. VII, Sec. 15-148).

For the present study, data were collected on all juveniles who received a curfew violation during the 31 months after the curfew was implemented in May 1995. The information on the curfew violators and their violations was obtained directly from police reporting forms. The following three separate sources of data were used: (a) curfew violator records, (b) juvenile arrest records, and (c) adult arrest records for curfew violators who aged out of the juvenile system during the 31 month study period (May 1995 through November 1997).

RESULTS

During the study period, a total of 1,036 juveniles were cited by the police for curfew violations. About three quarters (74.2%) were males, and three fifths (58.9%) were African American (see Table 1). The vast majority of the juveniles were either 14 (29.9%) or 15 (38.6%) at the time of their first curfew violation. Only one in six (15.4%) was under the age of 13 at the time of the first violation. A substantial minority (47.7%) were living with single mothers, and only a third (30.7%) were living with both parents. The majority (63.7%) had never been arrested before. About one in five (18.7%) had a

Table 1: Background Characteristics of Curfew Violators, May 1995 to November 1997 in Charlotte, North Carolina (N = 1,036)

	<i>Number</i>	<i>Percentage</i>
Gender		
Male	769	74.2
Female	267	25.8
Race		
African American	610	58.9
White	393	38.0
Hispanic	12	1.2
Asian	20	1.9
Living with		
Both parents	318	30.7
Single mother	494	47.7
Single father	74	7.1
Other relatives	107	10.3
Other	43	4.2
Age at first violation		
6 to 10	29	2.9
11	44	4.2
12	86	8.3
13	167	16.1
14	310	29.9
15	400	38.6
$\bar{x} = 13.81, sd = 1.42$		
Number of prior violent arrests		
0	842	81.3
1	118	11.4
2	41	4.0
3	17	1.6
4	9	0.9
5-plus	9	0.9
$\bar{x} = 0.33, sd = 0.85$		
Number of prior arrests		
0	660	63.7
1	148	14.3
2	83	8.0
3	42	4.1
4	36	3.5
5-plus	67	6.5
$\bar{x} = 1.05, sd = 2.09$		

(continued)

Table 1 Continued

	<i>Number</i>	<i>Percentage</i>
Location of first violation		
Adam Bureau	220	21.2
Baker Bureau	389	37.5
Charlie Bureau	118	11.4
David Bureau	309	30.0

prior arrest for a violent offense. The two areas in which most curfew violators were picked up were in the Baker Bureau (the affluent area of town) and the David Bureau (the inner city).

Some significant differences were found to exist among the background characteristics of racial groups. Although, as mentioned above, curfew violators were predominantly male, a significantly higher percentage of White offenders (30.8%) than either African American (23.0%) or Asian/Hispanic offenders (18.8%) were female (chi square = 8.5, $df = 2$, $p = .01$). Although a majority of both White (53.2%) and Asian/Hispanic (56.3%) curfew violators were living with both parents, only 14.9% of African American offenders were in intact families. African Americans (58.9%) were significantly more likely than either Whites (32.1%) or Asian/Hispanic offenders (25.0%) to be living with a single mother (chi square = 198.90, $df = 8$, $p > .001$). African Americans (43%), finally, were significantly more likely than Whites (27.0%) or Asians/Hispanics (25.0%) to have a prior arrest (chi square = 28.22, $df = 2$, $p > .001$) and to have a prior arrest for a violent offense (26.4% vs. 7.9% of Whites, and 6.3% of Asian/Hispanics: chi square = 57.13, $df = 2$, $p > .001$).

The ethnic groups also differed significantly in terms of the area of town in which they received their curfew violations. Although 70.7% of the White curfew violators were cited in the Baker Bureau (the affluent area of town), only 17% of the African American and 18.8% of the Asian/Hispanic offenders were.³ Conversely, although 47.9% of the African American curfew violators were cited in the David Bureau (the inner city), only 3.1% of the White offenders and 15.6% of the Asian/Hispanic offenders were. Asian and Hispanic youth (43.8%) were more likely than either White (15.0%) or African American (24.1%) youth to be cited in the Adam Bureau. Likewise, with 21.9% of their violators cited in the Adam Bureau, Asian/Hispanic offenders were more likely than Whites (11.2%) or African Americans (11.0%: chi square = 370.23, $df = 6$, $p > .001$) to receive their citations in that

Table 2: Postcurfew Violation Behavior of Sample From May 1995 to November 1997 in Charlotte, North Carolina (N = 1,036)

	<i>Number</i>	<i>Percentage</i>
Number of subsequent curfew violations		
0	907	87.5
1	93	9.0
2	21	2.0
3	12	1.2
4	3	0.3
$\bar{x} = .18, sd = .54$		
Number of subsequent arrests		
0	617	59.6
1	175	16.9
2	92	8.9
3	45	4.4
4	37	3.6
5	20	1.9
6	17	1.6
7-plus	33	3.2
$\bar{x} = 1.12, sd = 2.13$		
Number of subsequent violent offenses		
0	869	83.9
1	122	11.8
2	23	2.2
3	18	1.7
4	3	0.3
5-plus	1	0.1
$\bar{x} = .23, sd = .65$		

area of the city. Interestingly, although only 24.5% of the White offenders cited in the Baker Bureau had been previously arrested, 58.2% of the African American juveniles receiving curfew violations in the David Bureau had prior arrests.

Collectively, the 1,036 curfew violators generated a total of 1,216 curfew violations during the study period. The vast majority (87.5%) committed only one curfew violation (see Table 2).

However, a substantial minority (40.4%) were arrested for an offense subsequent to their first curfew violation. One in six (16.1%) was arrested for a subsequent violent offense. These figures include the 113 juveniles

Table 3: Demographic Characteristics of Curfew Violators By Precurfew and Postcurfew Violation Arrests From May 1995 to November 1997 in Charlotte, North Carolina (N = 1,036)

	<i>Group 1</i> <i>No</i> <i>Arrests</i> (n = 507)	<i>Group 2</i> <i>No Prior</i> <i>But Post</i> (n = 153)	<i>Group 3</i> <i>With Prior</i> <i>But No Post</i> (n = 110)	<i>Group 4</i> <i>Both Prior</i> <i>And Post</i> (n = 266)
Gender				
Male	44.2%	14.2%	12.4%	29.3%
Female	62.6%	16.5%	5.6%	15.4%
Chi square = 37.7, $p < .001$				
Race				
African American	42.3%	14.8%	10.5%	32.4%
White	58.8%	14.3%	10.9%	16.0%
Asian or Hispanic	53.1%	21.9%	9.4%	15.6%
Chi square = 41.07, $p < .001$				
Living situation				
Single mother	46.6%	16.2%	11.7%	25.5%
Single father	44.6%	9.5%	12.2%	33.8%
Both parents	57.9%	13.2%	9.8%	19.2%
Other relative	39.3%	20.6%	10.3%	29.9%
Other	41.9%	4.7%	2.3%	51.2%
Chi square = 39.07, $p < .001$				
Average age at first curfew violation				
	$\bar{x} = 13.60$	$\bar{x} = 13.90$	$\bar{x} = 13.94$	$\bar{x} = 14.11$
$F = 8.22, p < .001$				

who aged out of the curfew population and were arrested as adults during the study period.⁴

To determine the effects the curfew ordinance may be having on its violators, it is useful to categorize the curfew violators ($N = 1,036$) into the following four groups: those with no arrests other than the curfew violations (group 1); those with no arrests prior to their first curfew violation, but with arrests for other offenses at the time of or after their first curfew violation (group 2); those with arrests prior to their first violation, but with no arrests at the time of or after their first curfew violation (group 3); and those arrested both prior to their first violation and at the time of or after their first curfew violation (group 4). The curfew ordinance may have provided a positive intervention for the third group of violators (those who had been arrested before their first violation but not again afterward) and to a lesser extent for those in group 1 (those with no arrests other than for the first curfew violation). On the other hand, the curfew violation arrest may have had

an escalation effect on those in group 2 (those with no arrests prior to their first curfew violation, but with arrests at the time of, or after, the first violation).

The demographic characteristics of the juveniles in the four categories are presented in Table 3. As can be seen, those most likely to show the clearest signs of being deterred by the curfew violation arrest—that is, those in group 3 with prior but no postcurfew violation arrests—are most likely to be male and living with a single mother or a single father. Those for whom the curfew violation appears to be an aberration—that is, those in group 1 (with neither precurfew violation nor postcurfew violation arrests)—are most likely to be female, White, and living with both parents. Those for whom the curfew violation appears to be just another offense in a long career of criminal offenses (those in group 4) are most likely to be male, African American, and least likely to be living with both parents. Finally, those for whom the curfew violation arrest may have an escalation effect (those in group 2 with no prior but with a postcurfew violation arrest) are most likely to be Asian or Hispanic and living with a relative.

DISCUSSION

The data presented on the Charlotte curfew contain some interesting findings. First, in comparison with their representation in the general population, males, African Americans, older children (aged 14 and 15), and children without both parents at home are overrepresented among curfew violators. These characteristics mirror the general characteristics of juvenile offenders. This finding is underscored by the fact that males and African Americans are twice as likely as their counterparts to have been arrested both before and after their first curfew violation (see Table 3).

Second, there appear to be different types of violators cited in different areas of town. The data suggest that the curfew is primarily being implemented in two sections of the city with two rather different juvenile populations: the Baker section, the affluent sector of town, in which White youth have been receiving their first brush with the law; and the David section of town, the inner city, in which African American youth who have already been in trouble with the law are being cited for curfew violations. When the curfew was proposed, there were concerns that African Americans would be disproportionately targeted for curfew violations. These data clearly indicate that affluent, as well as less affluent, areas of town are being targeted for curfew violators. However, concerns might be raised about a net-widening effect of the curfew.

This concern is highlighted by the finding that the curfew exerts a differential impact on different types of juveniles. Particularly troublesome is the finding that the curfew may have an escalation effect for Asian and Hispanic youth. Clearly, there are cultural aspects to curfew implementation that need to be more fully explored.

Overall, this study suggests that the juvenile curfews may not only be somewhat ineffective in reducing juvenile victimization and deterring juvenile crime (e.g., Males & Macallair, 1998, 1999; Reynolds, 1997; Reynolds et al., 2000; Wright et al., 1994a, 1994b), but may also exert a deleterious effect on a subset of the juvenile population. The empirical evidence thus far would suggest that in and of themselves, curfews are not an effective strategy to manage juveniles or to reduce the likelihood of further crime, either for juveniles or for adults. In fact, the one study that demonstrated positive and promising results (Fritsch et al., 1999) used the following three components: saturation patrol, aggressive curfew, and truancy enforcement.

It is time to consult the scientific literature for effective solutions. A considerable amount of well researched, theoretically sound, and successful interventions for juvenile offenders has been identified (Farrington, 1994; Hawkins et al., 2000; Howell, 1995; Lipsey, Wilson, & Cothorn, 2000; Loeber & Farrington, 1997; Morgan, Nu'Man-Sheppard, & Allin, 1991; Sherman et al., 1998; Snyder & Sickmund, 1999; Tremblay & Craig, 1995). It is clear that the development of a youthful offender is a multidimensional process, involving inherent genetic and constitutional factors, neonatal, birth and post-natal care (Office of Juvenile Justice and Delinquency Prevention [OJJDP], 1998); medical and psychological influences (Farrington, 1989, 1998); familial issues; and the effects of school, peers, and the entire community (Hawkins et al., 2000; Hsia, 1997; Lipsey et al., 2000; OJJDP, 1998).

Strategies that are unidimensional in focus, targeting a single system (child, family, school, peer group) are unlikely to be successful in dealing with this complex problem. Wasserman and Miller (1997), along with many of the researchers previously noted, suggest early intervention and prevention strategies with component "building blocks" such as visiting nurses/infant health and wellness programs (Brooks-Gunn, Klebanov, Liaw, & Spiker, 1993; Farrington, 1994); parent education and preventative training programs (Morgan et al., 1991; Schweinhart, Barnes, & Weikart, 1993; Schweinhart & Weikart, 1980); school-based initiatives including the Social Development Strategy approach (Howell, 1995); promoting pro-social behavior among youth (Hawkins & Catalano, 1992); conflict-resolution strategies (Greenberg, Kusche, Cook, & Quamma, 1995); and antibullying

campaigns (Olweus, 1991). In this process it is vital to identify and treat juveniles with mental illness and youth with concurrent substance abuse disorders (Otto, Greenstein, Johnson, & Friedman, 1992). With an adequate empirical base to guide development strategies, we can no longer waste our scarce resources on methods that are ineffective. Unfortunately, strategies such as the Drug Abuse Resistance Education (DARE) Program (Sherman et al., 1998) and juvenile curfews have political and media currency and enjoy community support because they appear to be doing something tangible, despite the fact that both approaches have failed to produce their intended results.

The resurgence of curfew regulations parallels the development of community policing, an approach that is based on the following three key elements: problem solving, prevention, and partnership (Alpert & Piquero, 1998; Brown, 1989, 1990; Greene & Mastrofski, 1988; Riechers & Roberg, 1990; Sadd & Grinc, 1996). With regard to problem solving, considerable attention has been focused on frequent callers for police service and crime hot spots in an attempt to increase police efficiency. The prevention component of community policing has received far less attention. These data suggest that curfew violators provide an opportunity for both problem solving and prevention.

For the group that was arrested both prior to and after their curfew violation, curfew citations may signal youth who are already embedded in a criminal lifestyle at an early age. Clearly, law enforcement alone can do no more than identify the problem. Effective intervention with these troublesome youth will require a coordinated multiagency approach.

For the other groups, a curfew violation may signal a lack of parental supervision that could be augmented by positive program efforts. If curfew violators could be screened by a youth service worker who could refer the violators to other appropriate and needed services, the curfew regulation could be an effective delinquency prevention mechanism.

The resulting approaches must be community-wide in application: They must mobilize the community and its various social systems to act in concert and to intervene as early as possible to deflect the propensity for juvenile delinquency (Hawkins et al., 2000; Hsia, 1997; Lipsey et al., 2000; Loeber & Farrington, 1997; OJJDP, 1998; Sherman et al., 1998; Snyder & Sickmund, 1999; Tremblay & Craig, 1995). Serious decisions need to be made to address this problem that continues to plague our communities and society. Its remedies, however, are complex; but, with the proper implementation, the malady of juvenile delinquency can be definitively diminished. Let us approach the future armed with the tools necessary for the task.

NOTES

1. From 7% to 133%, depending on the crime (see Wright et al., 1994b; Table 9 on p. 13). All of the nine offenses examined showed an increase with five of the crime categories (assault, burglary, disorderly conduct, drug abuse, and vandalism), exhibiting an increase of over 100%.

2. "In Ventura County, curfew arrests of Hispanic and Black youth are 8.4 times and 7.4 times higher, respectively, than those of White youth. In Fresno and Santa Clara counties, Hispanic youth are 5 times more likely to be arrested for curfew violations, and Black youth 3 times more likely, than White non-Hispanic youth. Los Angeles authorities arrest Hispanic and Black youth for curfew violations at rates 2.5 times that of White and Asian youth" (Males & Macallair, 1999, p. 19).

3. The disproportional racial representation was most pronounced in one of the three Baker districts, which accounted for 223 (65.8%) of the 338 curfew violations in the bureau. In that district, 89.7% of the curfew violators were White, 8.5% African American, and 1.7% Asian or Hispanic.

4. A total of 464 juveniles aged out of the curfew population during the study period. Thus, about a quarter (24.4%) of those at risk as adults were arrested.

REFERENCES

- Alpert, G. P., & Piquero, A. (1998). *Community policing: Contemporary readings*. Prospect Heights, IL: Waveland.
- Brooks-Gunn, J., Klebanov, P. K., Liaw, F., & Spiker, D. (1993). Enhancing the development of low-birth weight, premature infants: Changes in cognition and behavior over the first three years. *Child Development, 64*, 736-753.
- Brown, L. P. (1989). Community policing: A practical guide for police officials. *Police Chief, 56*(8), 72-82.
- Brown, L. P. (1990). Neighborhood-oriented policing. *American Journal of Police, 9*(1), 197-207.
- Bykofsky v. Borough of Middleton, 401 F. Supp. 1242 (1975) and 429 U.S. 964 (1976).
- Click, B. R. (1994). Statistics in Dallas encouraging. *The Police Chief, 61*(12), 33-36, 57.
- Conference of Mayors. (1997). *A status report on youth curfews in America's cities*. Washington, DC: United States Conference of Mayors.
- Crowell, A. (1996, August). Minor restrictions: The challenge of juvenile curfews. *Public Management, 78*, 4-9.
- DeLucia, F. (1995). Comment: Connecticut's juvenile curfew ordinances: An effective means for curbing juvenile crime, or an unconstitutional deprivation of minor's fundamental rights? *Q Law Review, 15*, 357-406.
- Facts about Charlotte-Mecklenburg. (2000). *Charlotte's Web* [Online]. Available: www.charweb.org/welcome/edproj/infokit/charfacts.html
- Farrington, D. P. (1989). Early predictors of adolescent aggression and adult violence. *Violence and Victims, 4*, 79-100.
- Farrington, D. P. (1994). Early developmental prevention of juvenile delinquency. *Criminal Behaviour and Mental Health, 4*, 209-277.

- Farrington, D. P. (1998). Predictors, causes, and correlates of male youth violence. In M. Tonry & M. H. Moore. (Eds.), *Youth violence, crime and justice* (vol. 24, pp. 421-475). Chicago: University of Chicago Press.
- Fritsch, E. J., Caeti, T. J., & Taylor, R. W. (1999). Gang suppression through saturation patrol, aggressive curfew and truancy enforcement: A quasi-experimental test of the Dallas anti-gang initiative. *Crime and Delinquency*, 45(1), 122-139.
- Garrett, D. A., & Brewster, D. (1994). Curfew: A new look at an old tool. *The Police Chief*, 61(12), 29-33.
- Greenberg, M. T., Kusche, C. A., Cook, E. T., & Quamma, J. P. (1995). Promoting emotional competence in school-aged children: The effects of the PATHS curriculum. *Development and Psychopathology*, 7, 117-136.
- Greene, J. R., & Mastrofski, S. D. (1988). *Community policing: Rhetoric or reality?* New York: Praeger.
- Hawkins, J. D., & Catalano, R. F., Jr. (1992). *Communities that care: Action for drug abuse prevention*. New York: Jossey-Bass.
- Hawkins, J. D., Herrenkohl, T. I., Farrington, D. P., Brewer, D., Catalano, R. F., Harachi, T. W., & Cothorn, L. (2000, April). Predictors of youth violence. *OJJDP Juvenile Justice Bulletin*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Hemmens, C., & Bennett, K. (1999). Juvenile curfews and the courts: Judicial response to a not-so-new crime control strategy. *Crime and Delinquency*, 45(1) [Online]. Available: http://web4.searchbank.com/itw/session.1/876/7882350w5/4!xrn_1_0_A5321796
- Howell, J. (Ed.). (1995). *Guide for implementing the comprehensive strategy for serious, violent, and chronic juvenile offenders*. Washington, DC: Office of Juvenile Justice and Delinquency Prevention, U.S. Department of Justice.
- Hsia, H. M. (1997, June). Allegheny County, PA: Mobilizing to reduce juvenile crime. *OJJDP Juvenile Justice Bulletin*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Hunt, A. L., & Weiner, K. (1977). The impact of a juvenile curfew: Suppression and displacement in patterns of juvenile offenses. *Journal of Police Science and Administration*, 5(4), 407-412.
- Johnson v. City of Opelousas, 658 F. 2d 1065 (Fifth Circuit, 1981).
- Jordan, M. (1993). From the constitutionality of juvenile curfew ordinances to a children's agenda for the 1990s: Is it really a simple matter of supporting family values and recognizing fundamental rights? *St. Thomas Law Review*, 5, 389-431.
- Kizer, S. A. (1997). Juvenile curfew laws: Is there a standard? *Drake Law Review*, 45, 749-765.
- LeBoeuf, D. (1996). *Curfew, an answer to juvenile delinquency and victimization?* Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Lipsey, M. W., Wilson, D. B., & Cothorn, L. (2000, April). Effective intervention for the serious juvenile offender. *OJJDP Juvenile Justice Bulletin*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Loeber, R., & Farrington, D. P. (Eds.). (1997). *Never too early, never too late: Risk factors and successful interventions for serious and violent juvenile offenders. Final report of the study group on serious and violent juvenile offenders*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.

- Males, M., & Macallair, D. (1998). *The impact of juvenile curfew laws in California*. San Francisco: Justice Policy Institute of the Center on Juvenile and Criminal Justice.
- Males, M., & Macallair, D. (1999). An analysis of curfew enforcement and juvenile crime in California. *Western Criminology Review*, 1(2) [Online]. Available: <http://wcr.sonoma.edu/v1n2/males.html>
- Marketos, A. K. (1995, spring). The constitutionality of juvenile curfews. *Juvenile and Family Court Journal*, 17-30.
- McColleston v. City of Keene, 586 F. Supp. 1381 (D.N.H., 1984).
- Morgan, J. R., Nu'Man-Sheppard, J., & Allin, D. W. (1991). Prevention through parent training: Three preventive parent training programs. In N. D. Reppucci & J. Haugaard (Eds.), *Prevention in community mental health practice* (pp. 83-94). Cambridge, MA: Brookline.
- Note. (1958). Curfew ordinances and the control of nocturnal juvenile crime, *University of Pennsylvania Law Review*, 107, 66-102.
- Nunez v. City of San Diego, 114 F. 3d 935 (Ninth Circuit, 1997).
- Office of Juvenile Justice and Delinquency Prevention. (1998, May). Serious and violent juvenile offenders. *OJJDP Juvenile Justice Bulletin*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Olweus, D. (1991). Bully/victim problems among school children: Basic facts and effects of a school based intervention program. In D. J. Pepler & K. H. Rubin (Eds.), *The development and treatment of childhood aggression* (pp. 411-444). Hillsdale, NJ: Lawrence Erlbaum.
- Otto, R. K., Greenstein, J. J., Johnson, M. K., & Friedman, R. M. (1992). Prevalence of mental disorders among youth in the juvenile justice system. In J. J. Cocozza (Ed.), *Responding to the mental health needs in the juvenile justice system* (pp. 7-48). Seattle, WA: The National Coalition for the Mentally Ill in the Criminal Justice System.
- Qutb v. Strauss, 11 F. 3d 488 (Fifth Circuit, 1993) and 511 U.S. 1127 (1994).
- Reynolds, K. M. (1997). *The impact of juvenile curfews on crime prevention*. Ann Arbor, MI: UMI Dissertation Services. (UMI Microform No. 9807504)
- Reynolds, K. M., Seydlitz, R., & Jenkins, P. (2000). Do juvenile curfew laws work? A time-series analysis of the New Orleans law. *Justice Quarterly*, 17(1), 205-230.
- Riechers, L., & Roberg, R. (1990). Community policing: A critical review of underlying assumptions, *Journal of Police Science and Administration*, 17(2), 105-113.
- Ruefle, W., & Reynolds, K. M. (1995). Curfews and delinquency in major American cities. *Crime and Delinquency*, 41(3), 347-363.
- Ruefle, W., & Reynolds, K. M. (1996). Keeping them at home: Juvenile curfew ordinances in 200 American cities, *American Journal of Police*, 15(1), 63-84.
- Sadd, S., & Grinc, R. (1996). *Implementation challenges in community policing*. Washington, DC: National Institute of Justice.
- Scherr, P. L. (1992). The juvenile curfew ordinance: In search of a new standard of review. *Journal of Urban and Contemporary Law*, 41, 163-192.
- Schweinhart, L. J., Barnes, H. V., & Weikart, D. P. (1993). *Significant benefits*. Ypsilanti, MI: High/Scope.
- Schweinhart, L. J., & Weikart, D. P. (1980). *Young children grow up*. Ypsilanti, MI: High/Scope.

- Sherman, L. W., Gottfredson, D. C., MacKenzie, D. L., Eck, J., Reuter, P., & Bushway, S. D. (1998, July). Preventing crime: What works, what doesn't, what's promising. *Research in Brief*. Washington, DC: National Institute of Justice.
- Slavick, P., & Aos, S. (1996). *Juvenile curfew and parental responsibility ordinances*. Olympia: Washington State Institute for Public Policy.
- Snyder, H., & Sickmund, M. (1999). *Juvenile offenders and victims: 1999 national report*. Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Toth, J. (1994-1995). Juvenile curfew: Legal perspectives and beyond. *In the Public Interest*, XIV, 39-87.
- Tremblay, R. E., & Craig, W. M. (1995). Developmental crime prevention. In M. Tonry & D. P. Farrington (Eds.), *Building a safer society: Strategic approaches to crime prevention. Crime and justice: A review of research* (vol. 19, pp. 151-236). Chicago: University of Chicago Press.
- United States Department of Justice. (1999). *Sourcebook of criminal justice statistics, 1998*. [Online]. Available: www.albany.edu/sourcebook/1995/pdf/t410.pdf
- Wasserman, G. A., & Miller, L. S. (1997). Prevention of serious and violent juvenile offending. In R. Loeber & D. P. Farrington. (Eds.), *Never too early, never too late: Risk factors and successful interventions for serious and violent juvenile offenders. Final report of the study group on serious and violent juvenile offenders* (pp. 401-500). Washington, DC: U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention.
- Waters v. Barry, 711 F. Supp. 1125 (D. D.C., 1989).
- Wright, J. P., Hurst, Y. G., Sundt, J., & Latessa, E. (1994a, September). *The Cincinnati curfew ordinance: A preliminary report*. Cincinnati, OH: University of Cincinnati.
- Wright, J. P., Hurst, Y. G., Sundt, J., & Latessa, E. (1994b, November). *The Cincinnati curfew ordinance: An empirical examination of arrest rates*. Cincinnati, OH: University of Cincinnati.