



PREA LEGAL LANDSCAPE:
Prosecution and Discipline

May 19, 2021



IMPACT/JUSTICE

NATIONAL
PREA
RESOURCE
CENTER



Erica Gammill

Senior Program Associate

National PREA Resource Center

egammill@impactjustice.org

National PREA Resource Center Mission

The mission of the PRC is to assist adult prisons and jails, juvenile facilities, lockups, community confinement, and tribal facilities in their efforts to eliminate sexual abuse by increasing their capacity for prevention, detection, monitoring, responses to incidents, and services to victims and their families.

Logistics

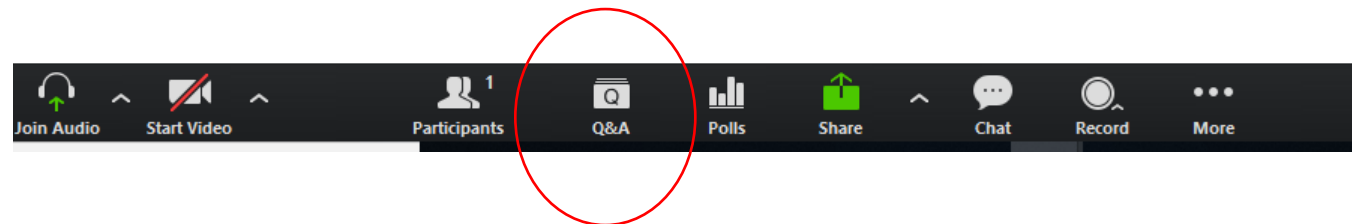
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Logistics

Submitting questions

- To submit a question during the webinar, use the Q&A feature on your webinar toolbar, as seen below.
- Presenters will address the questions at the end of the presentation.



COVID-19 disclaimer

This webinar is designed to provide guidance an overview of the PREA Legal Landscape related to Employment Litigation and will not specifically address concerns or answer questions related to COVID-19.

The PREA Resource Center (PRC) recognizes that coming into compliance or maintaining compliance with this Standard and others during the COVID-19 crisis presents specific challenges that you may not have faced before. If you have questions related to compliance during this crisis, please direct them to the PRC via “Contact Us,” and they will be shared with the PREA Management Office (PMO).

Or you may contact the PMO directly at PREACompliance@usdoj.gov.

PREA Legal Landscape



Prisoner
Litigation

Employment
Issues

Criminal
Prosecution



Brenda Smith

Professor of Law

Director, The Project on Addressing Prison Rape

American University

Washington College of Law

4300 Nebraska Avenue

Washington, DC 20016

bvsmith@wcl.american.edu

Prosecution and Discipline: Topics Covered

Staff-on-Inmate Sexual Abuse

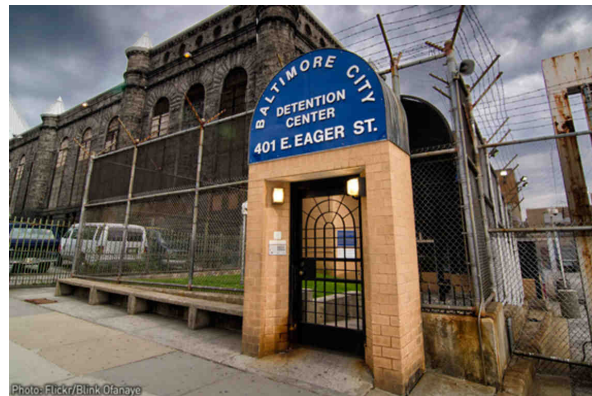
Inmate-on-Inmate Sexual Abuse

PREA Standards: Prosecution, Discipline, Investigations

Instructions for Corrections

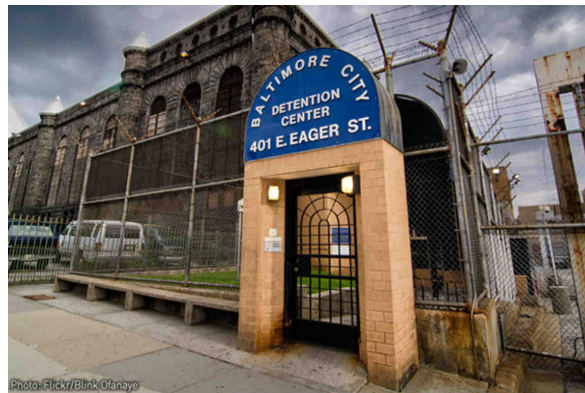
Staff-on-Inmate Sexual Abuse Baltimore City Detention Center

- By Feb. 2015, 40 of 44 people charged were convicted of racketeering, drug conspiracy, and money laundering conspiracy related to the operations of the Black Guerilla Gang in the Baltimore City Detention Center. Of the 40 convicted, 24 were correctional officers.
- Several of the female correctional officers involved had “sexual relationships” with Detention Center inmates.
- Four correctional officers gave birth to five children fathered by one of the inmate gang leaders, Tavon White.



Staff-on-Inmate Sexual Abuse Baltimore City Detention Center

- “Officers believed it was unlikely that they would be fired or face significant discipline even if they were caught smuggling contraband or fraternizing with inmates.”
- None were charged with sexual misconduct with detainees, despite ample evidence of these laws being broken.



Staff-on-Inmate Sexual Abuse Clinton Correctional Center, Dannemora, NY

- Escape from Clinton Correctional Center, Dannemora, NY, in 2015.
- Cut holes in cell walls and tunneled their way out.
- Three-week manhunt costing \$23 million in state law enforcement overtime and \$573,000 in prison repairs.
- NY IG investigation as to how they escaped from this maximum-security prison.



David Sweat, left, and Richard Matt

Staff-on-Inmate Sexual Abuse Clinton Correctional Center, Dannemora, NY

- Escapees received help from Joyce Mitchell, civilian supervisor in the prison tailor shop. She smuggled in tools used in the escape.
- Mitchell had sexual relationships with both escapees.
- Mitchell resigned from her job and pleaded guilty to felony promoting prison contraband and misdemeanor criminal facilitation, and sentenced to between 2 1/3 and 7 years.
- Mitchell pleaded guilty of crimes unrelated to sexual abuse of inmates. She was not even charged with criminal sexual misconduct.



Prosecution for Sexual Misconduct Not Likely

- Employees are more likely to be fired or allowed to resign rather than being prosecuted.
- “Correctional staff are allowed to resign, an administrative sanction, in lieu of being criminally prosecuted for sexual abuse with persons in custody.” *
- In a report based on data from 2009-2011, BJS concluded that “[t]he most commonly imposed sanctions for staff sexual misconduct were loss of job (in 85% of incidents).”

* Smith, Brenda V., and Jaime M. Yarussi. "Prosecuting Sexual Violence in Correctional Settings: Examining Prosecutors' Perceptions." *Criminal Law Brief* 3, no. 2 (2008): 21.

Tragedy that Turned the Tide: Loss of William "Buddy" Sentner

- Inspector General Special Agent William "Buddy" Sentner killed by indicted prison guard.
- On June 21, 2006 OIG Special Agent Buddy Sentner went to arrest six prison guards indicted in a contraband-for-sex conspiracy at FCI Tallahassee, a federal women's prison in FL.
- One of the six, Ralph Hill, used his personal weapon to shoot and kill Sentner to evade arrest. Hill was also killed during the shootout.
- Sentner was the first employee of the Justice Department's inspector general office to be killed in the line of duty.
- Sentner's death brought broad attention to the public safety implications of sexual abuse in custody.

Tragedy that Turned the Tide: Loss of William "Buddy" Sentner

- Inspector General Special Agent William "Buddy" Sentner killed by indicted prison guard
- Although charges sprung from the contraband-for-sex conspiracy, the officers were charged with bribery, conspiracy to accept illegal gratuities, witness tampering, and mail fraud.
- Mail fraud and bribery-related charges were more severe than those involving the sexual abuse of prisoners, which were only misdemeanors at the time the offenses occurred.
- “All received one year in prison and three years probation except for Spence, who had suffered a stroke and was sentenced to a year of home detention and three years probation.”
- “Six Florida Federal Prison Guards Convicted, Sentenced On Rape and Corruption Charges,” Matthew Clarke, Prison Legal News, August 15, 2007.

BOP: Metropolitan Detention Center, NY

- In May 2017, three officers, including two lieutenants, were arrested on charges of sexually abusing at least half a dozen female inmates.
- The alleged assaults were often carried out late at night when the inmates were directed to leave their dormitories to clean other parts of the detention center.
- While most of the assaults cited in the indictments occurred in 2016, prosecutors disclosed that an inmate had told the FBI in 1995 that one of the two lieutenants indicted in May 2017 had raped her while she was on cleaning duty. That accusation did not result in charges.



50 State Survey of Criminal Laws Prohibiting Sexual Abuse of Individuals in Custody

- Statutes criminalizing sexual abuse of incarcerated persons by corrections staff.
- Inmate-on-inmate sexual abuse can also be prosecuted under states' sexual assault statutes.
- Felony offenses with prison sentences if found guilty.
- Sexual abuse defined by PREA Standards and state sexual assault statutes might differ; however, **if facilities find probable cause of sexual abuse under PREA, they must forward potentially criminal cases on to prosecution.**

<https://nicic.gov/fifty-state-survey-criminal-laws-prohibiting-sexual-abuse-individuals-custody>

Green Hill (juvenile facility), WA

- Culture of sexual abuse at all-male juvenile facility in Washington state, going back 10 years or more.
- Civil lawsuit by former juvenile detainee brought sexual abuse to light and led to prosecutions of some staff.
- In 2016, counselor Erin Stiebritz pleaded guilty to one count of first-degree custodial sexual misconduct. Instead of a sentencing range of six to twelve months in prison, she got two weeks at county jail and 46 days in counseling.
- Since then, at least two other women have pleaded guilty to sexual misconduct in 2018 and 2019. Katherine Kimbrel, accused of raping a 16 year-old six to seven times a month, received six months jail time.
- In previous years staff suspected of sexual abuse were allowed to resign and were not prosecuted.



California Department of Corrections and Rehabilitation

- The California Department of Corrections and Rehabilitation fired at least six male correctional officers for sexually abusing women in their custody between 2014 and 2018.
- In 2018, 337 staff-on-inmate incidents were reported in California prisons. Investigations substantiated only three of those allegations.
- Charged with felony sex crimes, two corrections officers, Stephen Merrill (groping multiple women) and Tony Garcia (oral sex), pleaded guilty and received sentences of probation.



Staff-on-Inmate Sexual Abuse Edna Mahan Correctional Facility

Edna Mahan Correctional Facility, Clinton, NJ

- Sexual abuse of prisoners by correction officers described as “an open secret.”
- At least 16 women claimed they were beaten or sexually abused by one correction officer between 2008 and 2010; he settled with six women for \$75,000. He was not criminally charged.
- In 2010 and 2011, three correction officers were fired after several women prisoners alleged sexual abuse dating back to 2008.

Staff-on-Inmate Sexual Abuse Edna Mahan Correctional Facility

Edna Mahan Correctional Facility, Clinton, NJ

- From October 2016 to November 2019, five Edna Mahan correction officers and one civilian employee were convicted or pleaded guilty to charges related to sexual abuse of more than 10 women.
- Corrections officer Mays was sentenced to 16 years, the longest for a staffer convicted of sexual abuse at Edna Mahan. Two other staffers received 3 years incarceration in 2017.
- The Hunterdon County Prosecutor's Office is still pursuing sexual assault cases related to Edna Mahan.

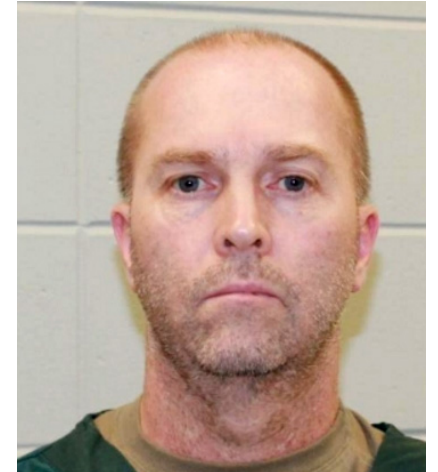


Left to right: Officers Thomas Sequine, Anwhar Dixon, Jason Mays, Joel Mercado, and Ronald Coleman. At right, civilian staff member Joel Herscap.

In Favor of PREA Implementation: *J.K.J. v. Polk County*

J.K.J. And M.J.J. v. Polk County, Wisconsin

- **Criminal Prosecution**
- Corrections officer Darryl Christensen repeatedly abused plaintiffs while they were in Polk County Jail between 2011 and 2014.
- The abuse was discovered after another victim reported abuse by Christensen in a neighboring county. Further investigation revealed sexual abuse of plaintiffs.
- In Nov. 2015, Christensen pleaded guilty to five counts of second-degree sexual assault by correctional staff. *Wis. Stat. § 940.225(2)(h)*.
- Sentencing recommendation was 8 years in prison, but the court rejected this and sentenced him to 30 years in prison.



Inmate-on-Inmate Sexual Abuse

Nature and handling of inmate-on-inmate sexual abuse:

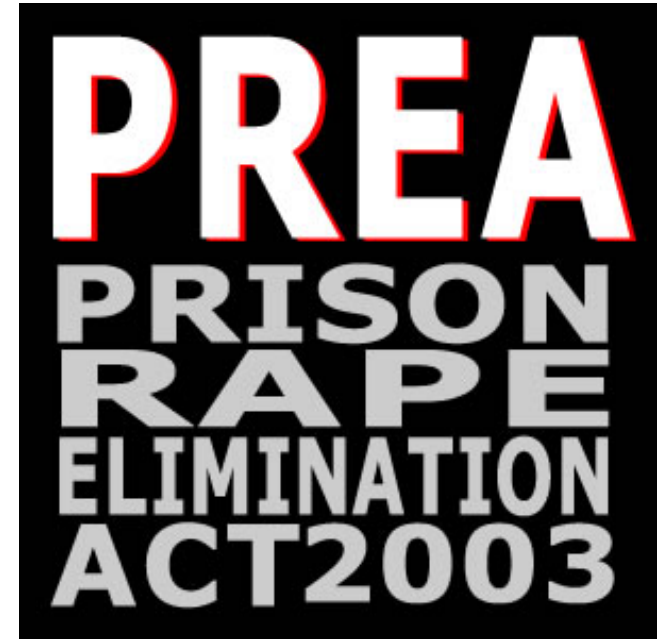
- Inmate-on-inmate sexual abuse categorized as consensual if no obvious signs of physical violence present.
- One inmate's word against another.
- But abuse if coercion, payment of a debt, protection, threat – any circumstance that is not willing participation in sexual act with another inmate.
- If consensual sex previously, the assumption is that all encounters are consensual.
- Most inmate-on-inmate sexual abuse claims result in administrative investigations.

Like with staff-on-inmate abuse, much goes unreported:

- Threat of violence or retaliation if reported.
- Risk of being labeled a “snitch.”
- Fear of punishment for reporting.

Prison Rape Elimination Act (PREA)

- **ZERO TOLERANCE** for sexual abuse and sexual harassment.
- National standards for the prevention, detection, reporting, and response to sexual abuse and harassment.
- PREA Standards are the minimum, baseline level.



PREA Standard: Prosecution

§ 115.22 Policies to ensure referrals of allegations for investigations

- (a) The agency shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.
- (b) The agency shall have in place a policy to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. . . .

PREA Standard: Prosecution

§ 115.71 Criminal and administrative agency investigations

- ...
- (d) When the quality of evidence appears to support criminal prosecution, the agency shall conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.
- ...
- (g) Criminal investigations shall be documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.
- (h) **Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution.**

Garrity v. New Jersey

Garrity v. New Jersey, 385 U.S. 493 (1967)

- The government cannot use, in a criminal proceeding, information that government officials have obtained from a public employee who has been threatened with negative job consequences for failure to cooperate in an investigation.

Garrity v. New Jersey, cont.

- Investigate carefully in administrative or criminal investigation of allegations of staff sexual misconduct.
- Do not want to contaminate the process leading to possible criminal prosecution.
- Consult with prosecutors prior to administrative investigation to avoid compromising possible criminal investigation/prosecution.

Still, prosecutions are rare

Nature of reporting sexual abuse in corrections

- Collection of evidence difficult:
 - Fear of retaliation
 - Lack of processing of rape kits
 - DNA not available in a lot of sexual assaults
- Criminal investigations conducted by outside agency.
- Prosecutor may decide not to go ahead, even with substantial evidence; not “proof beyond a reasonable doubt.”

PREA Standard: Discipline

§ 115.76 Disciplinary sanctions for staff

- (a) Staff shall be subject to disciplinary sanctions **up to and including termination** for violating agency sexual abuse or sexual harassment policies.
- (b) **Termination shall be the presumptive disciplinary sanction for staff who have engaged in sexual abuse.**
- (c) Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

PREA Standard: Discipline

§ 115.76 Disciplinary sanctions for staff, *cont.*

- (d) All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, **shall be reported to law enforcement agencies, unless the activity was clearly not criminal;** and to any relevant licensing bodies.

PREA Standard: Discipline

§ 115.77 Corrective action for contractors and volunteers

- (a) Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with inmates and shall be **reported to law enforcement agencies, unless the activity was clearly not criminal**; and to relevant licensing bodies.
- (b) The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with inmates, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Weingarten Rule

NLRB v. J. Weingarten, Inc., 420 U.S. 251 (1975)

- The right to the presence of a union representative in investigatory interviews.
- An investigatory interview is one in which a supervisor questions an employee to obtain information which could be used as a basis for discipline.
- The supervisor has no obligation to inform an employee that they are entitled to union representation.
- For non-union private-sector employees, *Weingarten* rights do not apply.

Sexual Victimization in Juvenile Facilities Reported by Youth

About 7.1% of
detained youth
reported sexual
victimization

Abuse reportedly occurred
within 12 months of
admission to detention
facility. (2018)

**Staff commit more
sexual abuse on
youth than do
fellow residents.**

About 1.9% reported an
incident involving fellow
resident and 5.8% reported
incident involving staff. (2018)

**Female staff are
committing most
staff-on-resident
sexual abuse.**

In 2012 BJS data, 89.1% were
males reporting sexual
activity with female staff;
3.0% males with both male
and female staff.



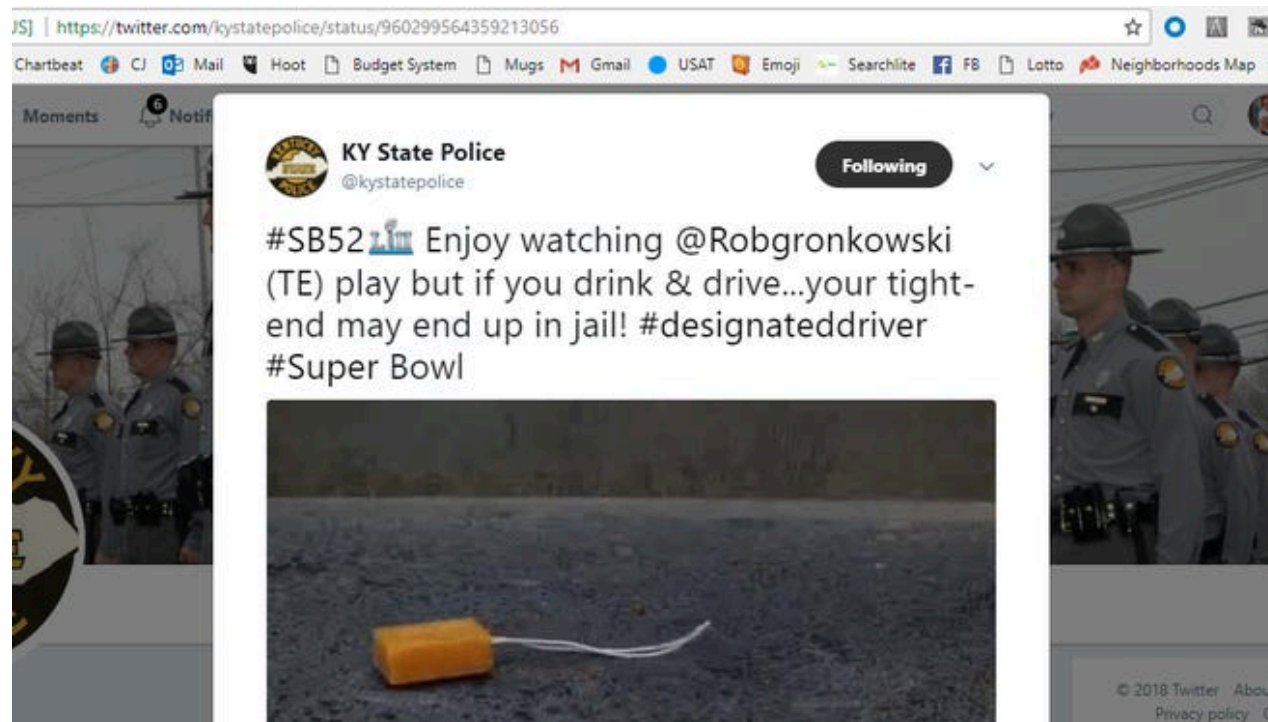
Mandatory Reporting

Survey of 50 States' Mandatory Reporting Requirements

- State statutes defining protected persons, who are mandated to report and penalties for failure to report abuse.
- Virtually all states consider it a crime of at least a misdemeanor for failure to report abuse of a **child under age 18**.
- Most states also criminally penalize failure to report abuse of **vulnerable adults**.
- States also impose monetary fines for failure to report.
- **Juvenile facility staff are Mandatory Reporters.**
- Adult corrections – check with state P&A for vulnerable adults .

Prevalence of Rape Culture

- Rape culture still prevalent in law enforcement and society.
- As a result, taken less seriously in facilities and in criminal justice system.



Investigation: PREA Standards

§ 115.21 Evidence protocol and forensic medical examinations

- (a) To the extent the agency is responsible for investigating allegations of sexual abuse, the agency shall follow a **uniform evidence protocol** that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

§ 115.34 Specialized training: Investigations

- (a) . . . to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such **investigations in confinement settings**.

Investigation: PREA Standards

§ 115.71 Criminal and administrative agency investigations

- (c) Investigators shall gather and preserve **direct and circumstantial evidence**, including any available physical and DNA evidence and any available electronic monitoring data; shall **interview alleged victims, suspected perpetrators, and witnesses**; and shall **review prior complaints** and reports of sexual abuse involving the suspected perpetrator.

§ 115.72 Evidentiary standard for administrative investigations

- The agency shall impose no standard higher than a **preponderance of the evidence** in determining whether allegations of sexual abuse or sexual harassment are substantiated.

Administrative Investigations

- No prosecution? Must still conduct **administrative investigation**.
- Standard of proof: **preponderance**
- Finding of substantiated, unsubstantiated, or unfounded.
- **Sexual Assault Review Team** and corrective action for substantiated and unsubstantiated sexual abuse.
- **Discipline** for staff-on-inmate and inmate-on-inmate sexual abuse and sexual harassment, up to termination.
- **Enforce and keep records** of all discipline, regardless of level, for sexual abuse and sexual harassment.

PREA Standard: Disciplinary Sanctions for Inmates

§ 115.78 Disciplinary sanctions for inmates

- (a) Inmates shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engaged in inmate-on-inmate sexual abuse or following a criminal finding of guilt for inmate-on-inmate sexual abuse.
- (b) Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories.
- (c) The disciplinary process shall consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

PREA Standard: Disciplinary Sanctions for Inmates

§ 115.78 Disciplinary sanctions for inmates (cont.)

- (d) If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending inmate to participate in such interventions as a condition of access to programming or other benefits.
- (e) The agency may discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact.
- (f) For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

PREA Standard: Disciplinary Sanctions for Inmates

§ 115.78 Disciplinary sanctions for inmates (cont.)

- (g) An agency may, in its discretion, prohibit all sexual activity between inmates and may discipline inmates for such activity. **An agency may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.**
- In other words, can discipline inmates for consensual sex, but **consensual sex between inmates is not a violation of PREA.**
- However, many institutions inappropriately consider coercive sex without physical violence among inmates as consensual sex.

Prosecution of Sexual Abuse in Corrections

2015 Survey of Sexual Victimization (SSV)

- 42% sexual victimization committed by staff
- 58% sexual victimization committed by other inmates
- About 1 in 10 cases of reported sexual victimization by other inmates were substantiated between 2012 and 2015.
- § 115.72 – Evidentiary standard of preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.
- Prosecution – evidentiary standard of proof beyond a reasonable doubt.
- If they do not have physical evidence, prosecutors will not likely seek prosecution.

Prosecution for Sexual Abuse in Corrections

- *“Instead, charging standards should reflect what the research tells us: that rape occurs out of the view of witnesses, delayed reports are common, piecemeal disclosures are common, corroborating physical evidence is often not available, and the lack of vaginal/anal trauma is not inconsistent with a report of sexual assault.”*
- The Prosecutors’ Resource: Sexual Abuse in Confinement, Appendix A. A Snapshot of Best Practices, Aequitas, January 2016, p. 39.

Instructions for agencies and facilities

- Enforce PREA Standards: **zero tolerance**.
- Be consistent and up-to-date on **PREA trainings** and refreshers.
- Be consistent and enforce employee and inmate **discipline**.
- Keep detailed **personnel and discipline records**.
- Establish effective **screening and classification** protocols.
- **Investigate** sexual misconduct pursuant to PREA Standards, even if no prosecution.
- **Monitor for retaliation** against inmates and staff.
- Evaluate and implement **corrective action**.
- Keep **records** of all that you do.

Toolkit and Resources

Toolkit

- PREA Policies
- State Criminal Laws
- Anti-fraternization Policies
- Collective Bargaining Agreements
- Mandatory Reporting Laws

Resources

- PREA Resource Center
- Project on Addressing Prison Rape
- National Institute of Corrections
- Just Detention International
- RAINN
- Prison Legal News
- Human Rights Watch
- Local News/Social Media



For questions for
Prof. Brenda V. Smith,
please email her at
bvsmith@wcl.american.edu

Question & Answer – 90 min. Live Session Reminder

- A 90-minute live Q&A session for this webinar series will be held the following week on Wednesday, May 26, 2021 at 2:00 p.m. EST.
- A registration link will be included with the evaluation survey and posted with the archived webinar recording shortly. Please submit your questions in advance **(from all 3 webinars)** no later than Friday, May 21, 2021 to Erica Gammill – egammill@impactjustice.org.



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Documentation Requirements - Juvenile PREA Standards

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TOOL: AUDIT

Documentation Requirements - Prisons and Jail PREA Standards

STANDARDS: All

FACILITY: Prisons and Jails	TERMS: Compliance (+1)
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FEATURED RESOURCE

WEBINAR

Power Hour: Chat with a PREA Expert on Standard 115.32

STANDARDS: 115.32

FACILITY: Community Confinement, Juvenile Facility (+2)	TERMS: Volunteers, Contractors (+2)
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WEBINAR

PRC Website Revision: Overview and Q&A

STANDARDS: None

FEATURED RESOURCE

WEBINAR

Developing a PREA-Compliant Language Access Plan for Incarcerated...

STANDARDS: 115.16, 115.21, 115.51, 115.53

FACILITY: Community Confinement, Juvenile Facility	TERMS: Accessibility, Limited English proficient (+2)
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TOOL: AUDIT

Audit Report Template - Juvenile Facilities

STANDARDS: 115.401

FACILITY: Juvenile Facility	TERMS: Audit, Audit Instrument (+2)
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Implementation

Implementation | Training | Request for assistance

PREA Standards

PREA toolsets

PREA in action

Training

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[Request Assistance](#)

Request for assistance

Please fill out the form below in order to request PREA-related training and/or technical assistance for your jurisdiction or agency. The more detail provided in your request will improve the PREA Resource Center's (PRC) ability to meet your needs. For jurisdictions less familiar with PREA, the PRC would encourage you to browse the resources on the [Where to begin page](#). If your jurisdiction has general questions or comments for the PRC you can communicate those through the [Contact us form](#).

To submit information on complaints or concerns about the conduct of a DOJ-certified PREA auditor, please refer to the [Auditor feedback form](#).

The PRC collects the information below in order to efficiently route and respond to inquiries. While all fields are not required, please fill out as much information as possible so that we may better assist you.

Request assistance

Jurisdictions can request assistance by completing a web form on the PRC website under the “Implementation” tab and clicking “Request for assistance” under “Training.”

Michela Bowman

PRC Co-Director

mbowman@prearesourcecenter.org

Jenni Trovillion

PRC Co-Director

jtrovillion@prearesourcecenter.org

For more information about the National PREA Resource Center, visit www.prearesourcecenter.org.

To ask a question, please visit our [Contact us](#) page.

Thank you!



Good luck!

Notice of Federal Funding and Federal Disclaimer

This project was supported by Grant No. 2019-RP-BX-K001 awarded by the Bureau of Justice Assistance. The Bureau of Justice Assistance is a component of the Office of Justice Programs, which also includes the Bureau of Justice Statistics, the National Institute of Justice, the Office of Juvenile Justice and Delinquency Prevention, the Office for Victims of Crime, and the Office of Sex Offender Sentencing, Monitoring, Apprehending, Registering, and Tracking. The opinions, findings, and conclusions or recommendations expressed in this publication/program/exhibition are those of the author(s) and do not necessarily reflect the views of the Department of Justice or grant-making component.