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Possibilities and Methods of Increasing Parental Responsibility for Juvenile Delinquents

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THE POSSIBILITIES AND METHODS OF INCREASING PARENTAL RESPONSIBILITY FOR JUVENILE DELINQUENTS[1]

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In considering the topic assigned I propose to make certain assumptions concerning its relation to the general subject of penology, and confine myself as quickly as possible to the somewhat narrow limits of the subject, treating it from three points of view:

1. The legal and constitutional aspect of the subject.
2. The administrative side.
3. The social or extra-judicial point of view.

I shall not attempt to present a solution, but to submit some of the results of my investigations in the hope that a profitable discussion will thereby be stimulated.

In the first place, I am going to assume that the most hopeful field of approach to the science of penology is in the work with the juvenile delinquents; in the second place, that the career of the ordinary delinquent offender is to a large extent governed by the conditions surrounding his youth; and in the third place, that the prevention of delinquency in youth is of greater importance and, of course, holds more promise of accomplishment than its cure.

Every writer on penology or juvenile delinquency will admit that the influence of parents or custodians having children in their charge is one of the controlling factors in the development of the child's character. Any social worker or probation officer can cite numberless cases of delinquency resulting from bad environment, or careless or unintelligent control, amounting in many cases to positive wrongdoing on the part of those who are responsible for the bringing up of the youth of the community.

Two sentences from Dr. Healy's book indicate clearly the modern thought upon this subject. He says:

"The subject of the effect of parental neglect as productive of delinquency is altogether too trite to be dwelled on in detail"; and

"There is not the slightest doubt in my mind that effective preventive treatment of delinquency under the law will never be carried out until

[1]Paper delivered at the 50th Annual Meeting of the American Prison Congress, Columbus, Ohio, Oct. 16, 1920.

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there is completely adequate power over the environmental contributors in delinquency."

The law has long recognized the liability of the owner or keeper of an animal for all damage occasioned by its depredations. Statutes commonly require the owner or keeper of a dog to pay double damages to any person injured thereby. The dog, having no initiative or responsibility of his own, the blame for his act is transferred entirely to his owner. How much different is the situation where children, belonging to a parent, cause expense or damage to the community? A parent voluntarily undertakes the duties of marriage and parenthood. The law gives him the control, custody and right to the earnings of the child until its majority, and likewise imposes upon him the duty to support, educate and maintain the child. The child has some mentality and some responsibility, differentiating it from the case of the animal.

The phenomenal growth of the juvenile court idea and the very general adoption throughout the country of statutes providing for special treatment of delinquent children has been but one indication of the conviction among legislators and the public generally that children before the law stood in a peculiar position and were responsible only in a limited degree for their wrongdoing. The crime committed by the child is the same crime perhaps as that committed by an adult, and in its effect upon society or upon the injured persons may be identical, but we have said that we will withhold punishment from the child for his offense in recognition of the fact that he is not entirely responsible for its commission, that heredity or environment, or the lack of appreciation of the consequences of his act, or the ease with which he could be induced to commit it may have conspired to bring about its commission. May it not be said to be a corollary to this proposition that just in so far as the responsibility of the child is reduced, the responsibility of some other person or agency is increased?

If we relieve a child from responsibility because of its insufficient or inadequate bringing up, must we not transfer the responsibility to those persons who are in turn responsible for the state of facts which predisposed him to delinquency? When one considers the tremendous amount of delinquency which has directly resulted from parental neglect, it seems somewhat strange that society has not heretofore been willing to proceed directly to the source of the trouble. The question presents itself, "Is the failure to do this because of a conviction in the public mind that you cannot properly and legally punish one person for the acts of another?" Cannot the responsibility of the parent be brought

home to him as a delinquency of his own? When he brings his children into the world, does he not assume at least part responsibility for their delinquencies arising from his neglect, and can he later escape the results of neglecting that responsibility by claiming that he is being punished for the act of another? Cannot the parent and the child be said to be in pari delicto?

There is more truth than fiction in the graphic story of O. Henry's in which the shiftless father, not wishing to be bothered to entertain his daughter, sends her into the street. When, a few years later, she is brought before the heavenly tribunal to be tried for the murder of her lover at an East Side dance hall, she is summarily discharged, and the celestial bailiff is commanded to descend to the earth and bring up "The Guilty Party."

I

I have been at considerable pains to determine the state of the statute law of the various commonwealths of the country on this question. Of the 48 states of the Union, all but one (Mississippi) have, in terms of statute law, at least, recognized the status of the delinquent child. In not all of these states is there a separate juvenile court. In many cases the police, superior or recorder's court acts as a children's court in the administration of the delinquent children act. The statutes range all the way from the simplest form of statute, granting authority to an already existing court to deal with minors as persons in need of support and encouragement rather than punishment, to the more complete statutes which provide all the machinery of a separate juvenile court with powers much more effective and immediate than those vested in the already existing tribunals. In Maine, Maryland, New Hampshire, North Carolina, South Carolina, Texas and Wyoming there can be said to be no really effective juvenile court. I have prepared a list of the most recent citations of all juvenile court and contributory delinquency statutes down to 1920, which I submit with this paper. (See end of article.)

There has been quite commonly adopted in connection with the juvenile court acts a section of the statute providing for the punishment of those contributing to the delinquency or dependency of children. I find the development and growth of this statute to be very enlightening upon the general subject under discussion. Some such law has been adopted in all the states of the Union except Arizona, Connecticut, Delaware, Florida, George, Maine, Mississippi, Missouri, New Hampshire, North Dakota, Oklahoma, Rhode Island, South Caro-

lina, Texas, Vermont and Wyoming. The earliest statute of this nature to be adopted is that of Colorado, in 1903, which declared that

"the parent, legal guardian or person having custody of the child, or any other person who contributes to its delinquency shall be deemed guilty of a misdemeanor."

These statutes have come to be known as contributory delinquency or contributory dependency statutes, and they vary in length and completeness all the way from the one just quoted to the statute adopted in 1919 by the state of Montana, which reads as follows:

"Any parent or parents, legal guardian or other person who shall encourage, wilfully cause or contribute to, or through negligence in the care, custody, guidance, education, maintenance or direction of any child under eighteen years of age, *cause* or *permit* such child to violate any law of this state, or the ordinance or ordinances of any city of this state, or to be or become incorrigible, or to knowingly associate with thieves, vicious or immoral persons; or to grow up in idleness or crime, or to knowingly enter a house of prostitution; or to knowingly visit or patronize any place, house or apartment building where any gambling device is or gambling devices are, or shall be operated or run, or where any gambling is done or conducted or to patronize or visit any saloon or saloons, or dram shops or dram shops, where intoxicating liquors are sold, or to patronize or visit any public pool room or pool rooms, or bucket shop, or to wander about the streets of any town or city in the night time, without being on lawful business or occupation, or to habitually wander about or visit any railroad yards or tracks, or to jump or hook on any moving train or to enter any car or engines, without lawful authority; to habitually use any vile, obscene, vulgar, profane or indecent language, or to be guilty of immoral conduct in any public place, or about any school house or grounds, or to keep or permit it in or about any saloon or place where spiritous liquors, or intoxicating liquors are sold or handled or in any gambling house or place where gambling is practiced, or in a house of ill fame or prostitution; or to become addicted to the use of spiritous and intoxicating liquors not for medicinal purposes prescribed by a physician, shall be guilty of a misdemeanor, and upon trial and conviction thereof shall be fined in a sum not less than ten dollars ($10) and not to exceed one thousand dollars ($1,000) or imprisonment in the county jail for a period not exceeding nine months, or by both such fine and imprisonment."

Most statutes provide for the punishment of two separate misdemeanors—contributing to delinquency or contributing to dependency. The State of Ohio, realizing a difficulty encountered in one of the decided cases which will be touched upon, has passed what is submitted to be one of the best statutes on the subject, which is found in Patterson's Criminal Code, Sec. 1654:

Whoever abuses a child or aids, abets, induces, causes, encourages or contributes towards the dependency, neglect or delinquency as herein de-

fined of a minor under the age of 18 years, or *acts in a way tending to cause* delinquency in such minor, shall be punished, etc.

This makes it unnecessary for the court to find that dependency or delinquency actually exist and punishes any person who tends to cause the same.

The age of the child in these statutes varies from 15 to 18 years. Some states give the separately established juvenile court or children's court jurisdiction of the crime of contributory delinquency or dependency. Some simply make it a misdemeanor, triable in a court of competent jurisdiction.

II

Having discovered that 32 states of the Union have adopted contributory delinquency statutes in the last sixteen years, it remains to discover how the courts have construed the statutes and whether they have been invoked as a means to prevent juvenile delinquency, and with what success.

Massachusetts has had a juvenile court act since 1906, and up to 1916 it contained an unworkable contributory delinquency section. About six years ago I spent some time endeavoring to amend this law in regard to contributory delinquency, in order to make it more effective, and was met with the argument that you could not punish one person for the fault of another and that there was doubt as to the constitutionality of such a statute. I have been interested, therefore, to examine into the decisions of our courts upon these statutes.

Of course the courts have long since determined the constitutionality and validity of juvenile court acts, so far as they apply to children. It has been repeatedly stated that such laws are not penal in nature, but are remedial, and should be liberally construed. (See *Commonwealth* v. *Yungblut,* 159 Ky. 91.)

> To save children from becoming outcasts, to protect them from neglect, to prevent them from becoming a charge of the Commonwealth and to help them to be useful and worthy men and women is the chief purpose of this act . . . to invest these courts with such power and authority as in the exercise of a reasonable discretion they might consider necessary and proper to protect the child described and to punish the person who caused the conditions stated.

More difficulty has presented itself in the construction of the contributory delinquency section. Some of the earlier statutes were either carelessly drawn in that they did not recognize that the contributory delinquency statutes operated to punish adults rather than

reform juveniles, or were deliberately drawn in that way in an attempt to give the juvenile judge power to enforce such statutes in the hope that action thereunder could be considered ancillary to his general juvenile court jurisdiction, and in one or two instances the offending adult was not surrounded by the constitutional guarantees, trial by jury, etc. The statute has been held invalid to that extent.

A very good case is the case of *Mill* v. *Brown,* 31 Utah 474, which upheld the juvenile court act but decided that section 7, the contributory delinquency section, was unconstitutional, because—

"the right of a jury trial and appeal was denied. This right is denied by Section 7 and it cannot therefore be upheld. Quite true, some method is necessary to punish adults when interfering with children who may be held to be wards of the state, and no doubt it is proper for the Legislature to provide for their punishment. When such is done, however, trial must be provided for in the proper forum and in legal manner."

The Supreme Court of Colorado, in *Gibson* v. *The People,* 44 Colorado 600, upheld this statute, saying—

"This species of legislation originated in Colorado, the act now before us being the first of the kind ever passed by any legislative body. It met at once with the approval of those actively engaged in bettering the condition of children, was cordially welcomed by bench, bar, pulpit and press as a long step in advance in treating the indiscretions of youth, has been literally and substantially adopted by several of the cities of the Union, made applicable by Congress to the District of Columbia, and has been and is receiving favorable consideration by the governments of the leading nations of Asia and Europe, whose earnest attention it has attracted."

The court, however, refused to apply the statute except in the case of a parent or person having custody of the child.

A very liberal construction was given by the Supreme Court of Washington in the case of *State* v. *Adams,* 95 Wash. 189, which upheld a properly drawn statute and further decided that it was not necessary to show that the child had already become delinquent in order to find an adult guilty of a misdemeanor in causing such delinquency. As the court said—

"It is just as bad a violation of the statute and indeed a much greater moral wrong to be the author of a child's dependency or delinquency as it is to encourage or contribute to the continuance of the pre-existing condition of dependency or delinquency."

The Supreme Court of Idaho, in *State* v. *Drury,* 25 Idaho 787, also upheld a statute which provided punishment in the proper manner and held further that it was not necessary to allege the specific acts of delinquency which the child had engaged in.

The Supreme Court of Michigan, in *Attorney-General* v. *Lacy,* 180 Mich. 333, denied the constitutionality of this section because the act was improperly drawn in that it gave jurisdiction to the wrong court.

In no state, however, has there been a decision to the effect that a contributory delinquency statute properly drawn is unconstitutional. These cases, however, clearly indicate that the contributory delinquency statute must be drawn with certain reservations. First, it must assure to the defendant the constitutional guarantees of appeal, jury trial, confrontation by witnesses, etc. Second, it must not attempt to confer jurisdiction upon a court which does not have general criminal jurisdiction. Third, it should provide for the issuance of complaint in a proper manner. In spite of the liberal construction by the Washington court, it ought to provide that a person should be punished for doing any act likely to cause delinquency and not limit itself to cases where a child had already been adjudicated delinquent. Its language should be definite as to what persons may be punished for contributory dependency and delinquency, in order that it need not be limited by the decision of the Colorado court.

It is well established, therefore, that such statutes, when properly drawn, are constitutional and valid. It has still been said that such statutes are unworkable in practice and that unless the juvenile court itself could administer them in summary fashion, they would prove futile. I have therefore made careful inquiries in six states to determine the utility of such laws.

The Illinois statutes provide for punishment of adults contributing to dependency or delinquency as for a misdemeanor. These cases are generally brought to the attention of the juvenile court, as is the case in Chicago, and the juvenile court frequently refers complaints to the domestic relations session of Judge Olson's court, and quite often the probation officer himself makes the complaint. The complaints in the domestic relations sessions for contributory delinquency amount to an average of thirty a month, and for contributing to dependency, an average of eight per month. The chief clerk in this department states, "This statute is a very efficient one to prevent juvenile delinquency."

In Indiana this statute is also invoked, and in the police court of Indianapolis, Judge Collins states that of an average of fifty complaints a year made in the juvenile court, thirty a year find their way for trial into his court on a change of venue. He states, "It is one of the best laws on the books for the protection of children."

In the report of Judge Harvey H. Baker, in the book published by the Judge Baker Foundation, giving the history of the first five years of his court in Massachusetts, the following statement is found:

"The attendance of at least one parent at the beginning of each case is insisted on, and parents are frequently called in to be advised or admonished while children are on probation. In some cases parents are caused to move their families to less crowded neighborhoods. In several cases parents have been caused to send their children to friends or relatives in the country during vacation and sometimes for longer periods. In some cases where parents have proved to be ineffective, brothers or more distant relatives have been called in. Parents have been ordered in several cases to pay a certain sum weekly for the support of their children while at the truant school. This court has no power to punish parents for the neglect of their children; it can only take the children in the Municipal Court."

In Massachusetts, although the law has now been in workable form since 1916, having been amended to give juvenile and municipal courts concurrent jurisdiction since the report of Judge Baker, I know of no case in which it has been invoked, and recent inquiry at the Boston Juvenile Court indicates that this act has not been availed of.

Commissioner Burdette G. Lewis, of the State Department of Charities and Correction in New Jersey, states that the law in his state is practically inoperative, although the juvenile judge may bind such cases over for action by the criminal court.

Inquiry at the children's court in New York elicits the following response from the chief clerk:

"The substance of the statute to which you refer has not been repealed. It is now included in Section 494 of the Penal Law of the State of New York. Apparently the constitutionality of this act has never been tested in an appeal because I am unable to find a citation of any case.

"Inasmuch as the Children's Court of the City of New York has no jurisdiction over adults, it is apparent that they cannot use this statute effectively as a means of reducing juvenile delinquency. The Court of Special Sessions of the City of New York, by constitutional provision, has exclusive jurisdiction in all cases of misdemeanor and the law makes the offense of contributing to the delinquency of children a misdemeanor. I have just this moment been in communication with the Court of Special Sessions and was informed that this section of the law is practically a dead letter, so much so indeed that only one case of prosecution under it could be recalled and that was several years ago."

It has remained for the State of Ohio to give the most complete demonstration of the worth of such a statute. Inquiry at the juvenile court in Cincinnati reveals the fact that Section 1654, already quoted as a model statute, has been frequently invoked by Judge Hoffman's court in connection with its general juvenile court jurisdiction.

The right of appeal and jury trial, unless waived, are accorded the accused directly in the juvenile court, obviating reference to another jurisdiction and yet preserving the constitutional rights of the defendant.

During 1919 there were 49 complaints for contributing to delinquency, made either by probation officers or others, out of which number 39 were convicted. There were 17 complaints for contributing to dependency, of which number 8 were convicted, and there were 4 complaints for acts tending to cause delinquency, of which 3 were convicted. There has been a decrease of 17 per cent in juvenile delinquency during the last year, and in the opinion of Mr. Crouse, chief probation officer, "Section 1654 has a very material effect in reducing delinquency and is one of the best provisions of our code." Mr. Crouse makes the further suggestion that his very excellent statute should be further amended by making it a misdemeanor for a parent to prevent his child from receiving a proper education, and states that in his judgment 60 per cent of the truancy is due to the parent.

Judge Ben B. Lindsay is quoted as saying, "The acts enabling him to deal freely with the delinquent and dependent children, and to hold parents or adult agents responsible for the offenses of their wards; the acts holding fathers accountable for the support, care and maintenance of their offspring, the statutes providing punishment for cruelty to children—all enforced by one court—the essentials of juvenile court."

In spite of the testimony of New York and Massachusetts, the experiences of Ohio, Indiana and Illinois prove that the fact that the juvenile judge does not have direct and summary jurisdiction under contributory delinquency statutes is not fatal to their efficacy. It is better of course to have the juvenile judge administer them, as a concomitant to his juvenile jurisdiction, and by the weight of judicial authority, if a jury trial is granted, it is constitutional in theory and workable in practice. If jurisdiction is given to another court, usually a court of general criminal jurisdiction, this does not, as seems to have been assumed in some states, render the statute useless. A change of venue, as in Indiana, or a direct complaint by the juvenile probation officer, as in Illinois, answers the purpose, and co-operation between the two courts is quite usual and effective.

III

Such are the possibilities and the legal methods of enforcing parental responsibility. What other methods can society employ to bring home to parents a greater appreciation of their duty in the premises?

We must not be understood as suggesting that parental neglect is the sole cause of juvenile delinquency. Many a well-meaning, honest and hard-working father sees his child go wrong in spite of all he can do. Press of economic or family conditions makes it impossible for him to discharge his complete duty.

Let us, however, take but two bits of testimony, one from each extremity of our country. "Broken Homes," by Miss Colcord of New York, is an illuminating review of the effect which parental neglect has on delinquency in the East. From the Far West comes the report of the juvenile court of Seattle to the effect that 628 cases of juvenile delinquency out of 1,021 are definitely traced to improper parental control.

The following statement is taken from an interesting book entitled "The Young Malefactor," by Travis:

"One does not often blame parents and children for being ill or malformed, nor do we blame the parents if the atmosphere of the home is not thoroughly good, but the fact remains, disorganization exists and the way is open for delinquency to enter. Whether the parents distil illegal whisky, let the children run loose in a summer resort, a naval or military station with its quota of bad women, or train the child to carry on a feud, is all one from our standpoint. They may be doing the best they can, but the home is not well organized; it is only semi-functionary. No home is good unless the children are recognized practically, not theoretically, as of greater importance than any material thing pertaining thereto. Whether it is the parent who is so impoverished or ignorant that he sacrifices them for wages or for food; or whether it is the middle or better class parent who is so ignorant or lazy that he does not properly control the child, or whether it is the stupid parent who lets the child become permanently hurt by lack of care in hot weather, it is all one and the same thing, the home is non or semi-functionary, the parent is not doing what he was made for doing."

The delinquent child act in Massachusetts contains a most significant statement, which, by the way, appears in many similar acts in other states:

"This act shall be liberally construed to the end that the care, custody and discipline of the children brought before the court shall approximate as nearly as possible that which they should receive from their parents and that as far as is practicable, they shall be treated not as criminals, but as children in need of aid, encouragement and guidance."

The question immediately arises, Why does not the law see to it that children *do* receive the care, custody and discipline for which the law itself attempts to provide a substitute? Is it not more fundamental and logical to attempt to supply the real thing rather than an imitation?

While the law may attempt to approximate the care which they should receive from their parents, no artificial situation can replace the missing elements in the life of a neglected or abandoned child. Whatever may be said for the Spartan practice which delivered all boys into the care of the state at the age of twelve, the American civilization has been built upon the family as a unit. The disintegration of family life is no inconsiderable factor in the problem of juvenile delinquency.

And let it be remembered that this is not a problem concerning simply the families of the poor. No more frank and searching arraignment of the carelessness of the modern parent in well-to-do families can be found than in the article of Katherine Fullerton Gerould in a recent number of the Atlantic Monthly.

The greater duty of society, therefore, is not to remedy an existing situation by avoiding it, but to prevent the continuance of conditions which make such situations possible. Society cannot shirk its responsibility for the conditions which result in bad homes, by removing the child therefrom, or even by punishing the parent for his neglect. Better housing conditions, the reduction of poverty, the enforcement of prohibition, an extension of physical training and education, are but indications of the opportunities presented to improve conditions which inevitably result in delinquency. It will not be sufficient to enact model statutes punishing parents for contributing to delinquency. The community itself must be interested in the problem of better citizenship, better homes and better living conditions. In Boston we are very proud of our home and school associations, which aim to bring the parent in touch with the children and teachers in our public schools. In Cincinnati, Dr. Dyar has a mothers' club in every school. The splendid motive behind the "Big Brother Movement" cannot be too highly commended. The influence of the churches and the church schools should not be minimized, and in this connection how much more likely would the child be properly influenced by such surroundings if he were *taken* to church rather than *sent* there by his parents? Well does the judge of the juvenile court of Cincinnati say that no child should be taken before the judge until every other resource has been exhausted, and his court takes pride in the statement that 60 per cent of the boys had their cases adjusted without reference to the judge in 1917, and that 85 per cent were so handled in 1919.

"In Youngstown," states Judge Dahl B. Cooper, "we have a joint committee composed of 17 or 18 constituent agencies concerned with the boy and girl problem, such as the Y. M. C. A., Y. W. C. A., Playground Association, Visiting Nurses, and so forth, the writer being chairman of

that committee. We concluded that the various agencies in their normal work did not touch a sort of 'No Man's Land' comprising the boys who get into Juvenile Court, and who, in a certain sense, need help much more than some of the boys and girls helped by these institutions. We decided therefore to employ 8 workers under this joint committee to specialize upon the delinquency proposition and these workers have been on the job now for something over a year trying to occupy the idle time of our delinquent boys and girls, befriending them in every way possible and trying to keep them out of court. The work is in its infancy, but we feel it has been very successful, so much so in fact that the Board of Education is now taking up the experiment of taking over one of our men under their jurisdiction to do the same work as he has been doing with us, ostensibly as a truant officer, but really in a sense a worker out of the school. We feel in court here that our work has been reduced considerably by these field workers, and it is simply the common sense proposition of going after the causes instead of continually treating the effects. In other words, we get the symptoms of the social disease in our Juvenile Court and follow these symptoms in the form of delinquent boys and girls, out into their respective environments and these field workers try to either better that environment or offer something that will in a sense alleviate the situation, in the way of proper recreation."

In Boston recently I took occasion to ask of a group of executives in social work what practical suggestions they had to offer in the way of increasing parental responsibility through society effort.

One suggested that we had plenty of law in the matter, and what we needed was socialization of the law; that our law schools should socialize and humanize the teaching of the law so that lawyers and judges in later years would interpret the statutes in a more helpful manner.

Another one suggested that the economical conditions preventing early marriages were responsible for a lack of interest in their children by the women who had not been brought up to regard the home as the fundamental element in life.

One man said: "There is not much hope in the parents of this generation; we should work with the children of today to make them good parents for tomorrow."

Another advocated a special course in school for the training of children to be parents in their turn, and thus undertake real preventive and constructive work for the future.

The value of social service work in our schools and the opportunity of visiting teachers was emphasized by one member, and another remark was made to the effect that it should be the duty of some officer or agency to see that the excellent statutes on the books of the various commonwealths should be conscientiously enforced in all states and in

all localities in the state. I am told that even in Ohio not all the communities take the same interest in the juvenile law as does the City of Cincinnati.

The difficulty and importance of the problem and the need of mobilizing all of the resources of society to overcome the evils of juvenile delinquency are officially recognized by the statutes in Montana, in the provision for a Juvenile Improvement Committee; in Nevada by a statute providing for a Juvenile Probation Commission; in Chicago by the formation of the Juvenile Protective Association, and in Boston by the endowment of the Judge Baker Foundation.

Society cannot supply the need which a girl feels for her mother or a boy for his father, and it properly condemns the parent who complacently turns from the task of nourishing his child's soul. It is the moral obligation of any community, however, to insist not only upon the particular and immediate obligation of the parents, but as well upon the general obligation of society to the whole problem. Our courts, our legislatures, our public officers still need much education and intelligent support from the public along these lines.

You cannot legislatve love into a mother's heart. You cannot adjudicate generosity into the mind of a father. You cannot sentence the parent to sympathize with the child or sacrifice his happiness for its welfare. While statutes may be enacted and enforced, it remains for the pulpit and the press, the school, the woman's clubs, the social worker, the courts and the public generally to unite in a sincere endeavor to stimulate and increase the parent's appreciation of the solemn obligation he has taken voluntarily upon himself by reason of his parenthood, and by every proper means make it easier for him to live up to such obligation and more difficult to disregard it. If juvenile delinquency is to be overcome and crime decreased, society must resolutely address itself to the solution of this problem.

RECENT CITATIONS OF JUVENILE COURT STATUTES.

	Juvenile Court Statutes	Contributory Delinquency Sections	Cases
Alabama	Code, 1907, C. 105	1915, C. 506, Sec. 10	
Arizona	1913, Tit. 27	None.	
Arkansas.	K. & C., 1916, C. 47	C. 1594-3.	
California	1915, C. 631, Sup. Ct.	S. 21.	
Colorado	1903, P. 178	1903, P. 198	Gibbons v. People, 44 Colo. 600.
Connecticut.	G. S., 1918, C. 94-5	None.	
Delaware.	Rev. Code, 1915, S. 3827, et seq.	Support Only.	
Florida	Comp. Laws, 1914, C. 14A (Dist. Ct. as)	None.	
Georgia	6 Park Ann. Cod., Art. 11, S. 805, et seq.	None.	

RECENT CITATIONS OF JUVENILE COURT STATUTES.

	Juvenile Court Statutes	Contributory Delinquency Sections	Cases
Idaho	1919 (1911, C. 159)	S. 1017 (S. 159).	State v. Drury, 25 Id. 787.
Illinois	R. S., 1906, P. 717	1915, 3 S.	
Indiana	Burns, 1908, S. 1641, 1907, P. 266	S. 1648	Tullis v. Shaw, 109 Ind. 662.
Iowa	Code, 1913, S. 254, et seq.	S. A 31.	
Kansas	Gen. St., 1915, S. 7080	S. 155	In re Sills, 144 K. 856.
Kentucky	1915 (331 g)	(331 g)	Com. v. Yungblut, 159 Ky. 91.
Louisiana	3 Wolf. Const. and Stat., P. 2266, et seq.	1 Wolf, P. 447, 1918, C. 169	No cases.
Maine	S. 1919, C. 58 (No real Juvenile Ct.)	None.	
Maryland	4 Bagby, P. 184, S. 51 (Circuit as Juv.), 1916, C. 326	S. 59, 1916, C. 326, S. 14.	
Massachusetts	1906, C. 413, 1916, C. 243	1906, C. 413, S. 13.	
Michigan.	Comp. L., 1915, C. 64, S. 2011, et seq.	S. 2028 exercised by Prob.	Atty. Gen. v. Lacy, 180 M. 333.
Minnesota	1917, C. 397	S. 28.	
Mississippi	None	None.	
Missouri	Acts of 1919, P. 201-2	None	Juv. trial, 52 Mont. 550.
Montana	Rev. Codes, S. 9423, et seq. (Juv. Impr. Com.) (S. 9435).	S. 9439 A (1911, C. 333).	See Am't, 1919, C. 203, 3/11/19.
Nebraska	Comp St., 1909, S. 2796, et seq.	S. 20.	
Nevada	Rev. L., 1912, S. 728-56 (Probation Com.) (8 yrs.) (1911).	S. 757-764	No cases.
New Hampshire	Pub. St., C. 85 (No Juv. Ct.), 1907, C. 125	None	No cases.
New Jersey	1910, S. 1709	S. 214	No cases.
New Mexico	1917, C. 4	C. 4, S. 10	No cases.
New York	3 Cons. Laws 3836, S. 487 of Penal Law	S. 480-1-2-3-4-5-6.	
No. Carolina, S. 18	1919, C. 97 (Sep. part of Sup. Ct.)	S. 19 (good law)	No cases.
North Dakota	Comp. L., 1913, C. 23, S. 11402 (Wards of State), et seq.	None	No cases.
Ohio	Paterson, S. 1641 et seq.	S. 1654.	
Oklahoma	1909, p. 185, Rev. Laws, S. 4412	None	1919, C. 58, Com. of 3 to Codify and Improve Children's Laws.
Oregon, 1919, S. 296, Com. Del. Courts	1907, C. 34, 2 Lord's Ore. Laws, Sec. 4406	1907, C. 69, Lord's, S. 2150	State v. Dunn, 53 Oregon 304.
Pennsylvania	5 Purdon, P. 5607	S. 42, P. 5609, 1909, 5/6 P. L. 434.	
Rhode Island	1915, C. 1185	None.	
South Carolina	Acts, 1917, No. 73, P. 132 (not a real act)	None.	
South Dakota	Revised Code, 1909, S. 99, 72, et seq.	S. 10005, 1909, C. 275.	

RECENT CITATIONS OF JUVENILE COURT STATUTES

	Juvenile Court Statutes	Contributory Delinquency Sections	Cases
Tennessee	4 Ann. Code, Shannon, S. 4433-39, et seq.	S. 4433, @ 76, Acts, 1911, C. 58, S. 16.	
Texas, Del. Ch. Act, No Sup. Juv. Ct.	Crim. Stat., S. 1197, et seq.	None.	
Utah	1917, C. 11, S. 1848	1917, C. 2, S. 1848 (720 X 37)	Mill v. Brown, 31 U. 474.
Vermont	1917, Gen. Laws, C. 319	None.	
Virginia	1919, Code, C. 78-81	C. 78, S. 1923 (1914)	Gottlieb v. Comm'l, 101 S. E. 872.
Washington	Rem., 1915, S. 1987	S. 17.	State v. Adams, 95 W. 189.
West Virginia	1919, C. 111	S. 26.	
Wisconsin	1919, Stat., C. 48	1905, C. 444, now 1919, C. 186, S. 45810 (not part of Juv. Act.)	No cases.
Wyoming (No court)	Comp. Stat., 1910, C. 206, 1915, C. 99.	None	None.