

# LEX QUOD ORDO

ASSOCIATION OF PROSECUTING ATTORNEYS QUARTERLY NEWSLETTER | WINTER/SPRING 2014 VOLUME IV ISSUE IV

WELCOME TO THE LATEST EDITION OF LEX QUOD ORDO (LAW AND ORDER), THE ASSOCIATION OF PROSECUTING ATTORNEY'S QUARTERLY ELECTRONIC NEWSLETTER DEDICATED TO PROMOTING THE HIGH PERFORMANCE PROSECUTION FRAMEWORK. WE ARE EXCITED TO BRING YOU INTERESTING AND RELEVANT INFORMATION AND MATERIALS TO HELP YOU ENHANCE PUBLIC SAFETY IN YOUR COMMUNITIES, AS WELL AS HIGHLIGHT CURRENT AND FUTURE TRAINING OPPORTUNITIES.

IN THIS EDITION, HEIDI ALTMAN AND ANGIE JUNCK OF THE CAPITAL AREA IMMIGRANTS' RIGHTS (CAIR) COALITION REFLECT UPON THE ROLE OF THE PROSECUTOR WHEN A NONCITIZEN FACES THE POSSIBILITY OF DEPORTATION IN "WHY COMMUNITY PROSECUTORS SHOULD CARE ABOUT THE IMMIGRATION CONSEQUENCES OF CONVICTIONS". IN THE ARTICLE THE AUTHORS EXAMINE IMMIGRATION PENALTIES THAT FLOW FROM CRIMINAL CHARGES; EXPLORE HOW THESE PENALTIES IMPACT COMMUNITY SAFETY CONCERNS; AND DISCUSS IDEAS FOR MOVING FORWARD. IN "PROTECTING VICTIMS' PRIVACY RIGHTS: THE USE OF PSEUDONYMS IN CRIMINAL CASES", THE NATIONAL CRIME VICTIM LAW INSTITUTE (NCVLI) DISCUSSES THE SIGNIFICANCE OF THE USE OF PSEUDONYMS IN CRIMINAL CASES. THE ARTICLE DETAILS WHY USING PSEUDONYMS IN THE PLACE OF VICTIMS' REAL NAMES THROUGHOUT THE CRIMINAL JUSTICE PROCESS IS A CONSTITUTIONALLY PERMISSIBLE AND REASONABLE WAY TO PROTECT VICTIMS' PRIVACY RIGHTS AND INTERESTS WHILE MAINTAINING FAIRNESS AND CONSTITUTIONALLY OPEN COURT PROCEEDINGS, AND PROVIDES PRACTICE POINTERS FOR YOUR CONSIDERATION. AND WE ALSO DISCUSS CURRENT AND FUTURE TRAINING OPPORTUNITIES AVAILABLE THROUGH APA AND OUR CRIMINAL JUSTICE PARTNERS, INCLUDING INITIAL INFORMATION ABOUT THIS SEPTEMBER'S 9TH NATIONAL COMMUNITY PROSECUTION SUMMIT.

IN OTHER NEWS, AN AGENDA SURVEY FOR THE CONFERENCE WILL BE COMING TO YOU SHORTLY. PLEASE FILL IT OUT AND HELP US BUILD A BETTER SUMMIT. WE ALSO ENCOURAGE YOU TO KEEP US INFORMED ON WHAT IS HAPPENING IN YOUR JURISDICTION AND TO KEEP US ABEAST OF ANY NEW OR GROUND BREAKING INNOVATIONS THAT YOU ARE TESTING IN

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DIRECTOR, COMMUNITY PROSECUTION & VIOLENT CRIME  
DIVISION

# PROTECTING VICTIMS' PRIVACY RIGHTS: THE USE OF PSEUDONYMS IN CRIMINAL CASES<sup>1</sup>

"[P]rivacy is like oxygen; it is a pervasive, consistent need at every step of recovery. Within the context of the legal system, if a victim is without privacy, all other remedies are moot."<sup>2</sup> Some victims may welcome being publically identified as a part of criminal proceedings, but for those victims who may want or need to protect their privacy, the use of pseudonyms can be a powerful tool.<sup>3</sup> The availability of such a tool is important because the loss of privacy can have serious consequences for victims. Unwanted publicity can subject victims to public scorn and harassment and to other forms of revictimization at the hands of the justice system—often referred to as "secondary trauma" or "secondary victimization."<sup>4</sup> Compelling disclosure of a victim's identity may also weaken confidence in the criminal justice system as a means to protect and serve the public. Thus, allowing victims to proceed by pseudonym in criminal proceedings not only helps prevent "secondary victimization," but also assists with the proper functioning of the system.

## I. Use of Pseudonyms in Criminal Cases: Why It Matters

"In the aftermath of crime, participation in the criminal justice system can be beneficial for crime victims."<sup>5</sup> But for some victims, interactions with justice system personnel and processes can cause secondary victimization, which has been associated with increased posttraumatic stress symptoms and other physical and mental distress.<sup>6</sup>

One source of such harms can be the unwanted publicity and loss of control experienced when victims' identities are revealed as part of the criminal justice process without their consent.<sup>7</sup> The use of pseudonyms by victims may reduce the risk of this revictimization at the hands of the justice system.

The consequences associated with a crime victim's loss of anonymity in justice proceedings may be particularly severe now that public access to criminal proceedings has been radically transformed by widespread use of the Internet. As more jurisdictions make public records available online, the reality of court records existing

in "practical obscurity," available only to those individuals willing and able to seek them out at the local courthouse, is becoming a thing of the past.<sup>8</sup> Today, anyone can retrieve a variety of records simply by typing a name into a search engine, and the existence of e-mail, social networking websites like Facebook and Twitter, as well as blogs, means this information can then be shared with thousands all over the world in an instant. Even accidental disclosure of information can become permanent in the public sphere once it enters the Internet.<sup>9</sup>

When the criminal justice system compels the unnecessary disclosure of victims' private information, the effects are not limited to the victims—public trust in the system may be diminished.<sup>10</sup> And because unwanted publicity can have a chilling effect on victims' willingness to report crimes or participate in the system, system-sanctioned invasions of victims' privacy also undermine the basic administration of justice.<sup>11</sup>

## II. The Use of Pseudonyms is a Constitutionally Permissible and Reasonable Way to Protect Victims' Privacy Rights and Interests

### A. Victims' rights support proceeding by pseudonym.

A number of jurisdictions expressly provide for the right of victims of sexual assault and child victims to proceed by pseudonym.<sup>12</sup> But even without a statute providing an express right, all victims have other rights that support proceeding by pseudonym, including the rights to: privacy; protection; access to the courts; be treated with fairness, dignity, and respect; and be free from intimidation, harassment, or abuse in the criminal justice process.<sup>13</sup>

A victim's right to privacy is a constitutionally protected interest under the federal Constitution and, in many jurisdictions, is also protected by statute or state constitutional provision.<sup>14</sup> The right to protection relates to the victim's right to safety from the accused or those acting on behalf of the accused. On the federal level, the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771,

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<sup>1</sup> For a full list of references and footnotes go to <http://apainc.org/html/Citations.pdf> or click [here](#).

provides crime victims with “[t]he right to be reasonably protected from the accused.”<sup>15</sup> At least nine states also provide victims with a broad constitutional right to protection,<sup>16</sup> and several other states provide victims with constitutional and statutory rights to be free from intimidation, harassment, or abuse.<sup>17</sup>

Despite these rights, there are hurdles to proceeding by pseudonym in the criminal case. Foremost among these are the public’s and media’s First Amendment right of access to court proceedings, and the defendants’ constitutional rights to a public trial and to prepare a defense.<sup>18</sup> When a court considers the propriety of a victim proceeding by pseudonym, it must weigh the victims’ rights with these other rights.<sup>19</sup>

*B. Victims use of pseudonyms does not create a per se violation of the public’s or media’s right of access or the defendant’s right to a public trial.*

The media and public have a presumptive right of access to court proceedings and records under the First and Fourteenth Amendments to the Constitution and state law,<sup>20</sup> and the Sixth Amendment guarantees that “[i]n all criminal prosecutions, the accused shall enjoy the right to a . . . public trial.”<sup>21</sup> None of these rights are absolute, however, and a court may properly conclude that victims’ interests in the non-disclosure of their identifying information weigh more heavily in a given case.<sup>22</sup> For instance, in *United States v. Troup*, the United States District Court for the Northern District of Indiana ordered that the child-victims be referred to only by pseudonyms in all court filings and during all trial stages, including voir dire.<sup>23</sup> As the court explained:

It is easy to see how the disclosure of a child’s name as the victim of a sex offense can be ‘detrimental to the child[.]’ . . . The factual nature of this case makes it likely, even probable, that the children involved will be subject to harassment by their peers if their names are publicly associated with the case, and the government has introduced evidence showing that such reprehensible behavior has already occurred.<sup>24</sup>

## **Intersections with Polyvictimization:**

Polyvictims—those who have experienced multiple victimizations of different types—are likely to have increased contacts with the justice system, generating more opportunities to experience system-based victimization. Also, the consequences of secondary victimization may be amplified for polyvictims because research shows that they tend to experience higher general levels of physical and psychological distress—including injuries, illness, anger, depression, anxiety, substance abuse disorder, and posttraumatic stress disorder. Given this evidence, it is critical that practitioners who work with polyvictims take steps—including requesting that the court permit the victims to proceed by pseudonym if they so choose—to mitigate the consequences of prior secondary victimization and work to prevent further system-based victimization. Regardless of whether a pseudonym was used by the victim in a prior case relating to a different victimization—and perhaps particularly if one was not used—using a pseudonym in the current criminal case may help prevent the prior victimization from improperly becoming a part of the discourse of the case.

*C. Use of pseudonyms by victims does not create a per se violation of the defendant’s right to prepare a defense.*

Ensuring victim anonymity requires that all documents,<sup>25</sup> including police reports and the indictment,<sup>26</sup> identify the victim only by pseudonym.<sup>27</sup> Although there is no general constitutional requirement that the name of the victim be present in an indictment,<sup>28</sup> defendants may challenge this practice as violating their right to prepare a defense on the basis that the use of pseudonyms violates their rights to be informed of the nature of the charges against them and to confront the witnesses against them.<sup>29</sup>

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Courts have generally found indictments that do not identify the victim by name to be constitutionally sufficient in cases where defendant knows the victim.<sup>30</sup> This is significant because in most incidents of violent crime, defendants know the identity of the victim.<sup>31</sup> Even where the victim's identity is unknown to the defendant, the right of confrontation is a trial right and not implicated or properly raised at the pretrial charging stage.<sup>32</sup> To the extent that a trial court deems defendant's knowledge of a victim's true identity as necessary for effective cross-examination at trial, a protective order that provides the necessary information to defense counsel to prepare a defense while protecting the victim's privacy should be requested, preventing counsel from sharing the victim's identity with defendant or anyone else not necessary to the preparation of a constitutionally adequate defense.<sup>33</sup>

Further, indictments have historically been considered constitutionally sound if they contain the elements of the offenses charged and fairly inform defendants of the charges they must defend against.<sup>34</sup> The level of specificity required to inform a defendant of the charges will vary based on the nature and circumstances of the crime charged,<sup>35</sup> however, as long as the indictment provides sufficient alternative information identifying the charged crime it satisfies constitutional requirements.<sup>36</sup> Thus, where an indictment contains other information—such as time, place and specific facts to provide defendants with notice of the charge against which they must defend—a pseudonym may substitute for the victim's true name.<sup>37</sup>

### III. Conclusion

Using pseudonyms in the place of victims' real names throughout the criminal justice process is a constitutionally permissible and reasonable way to protect victims' privacy rights and interests while maintaining fairness and constitutionally open court proceedings.

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### Practice Pointers

1. Make sure that any request to proceed by pseudonym is styled broadly, asking the court to employ measures to avoid the use of the victim's name in all documents, including the indictment, and during all court proceedings. Also, request that the court order be broad enough in its language to govern the conduct of all criminal justice parties and participants—including law enforcement, prosecution, defense, the court, and all of their agents.
2. Ask the court for a protective order in addition to proceeding by pseudonym. A protective order can forbid criminal justice participants, including defendant, from releasing the victim's name to others through non-judicial means including online social media platforms such as Facebook.
3. If the victim's name was disclosed in trial proceedings, move the appellate court to use pseudonyms when referring to the victim to minimize any additional harm.
4. A number of jurisdictions expressly provide for the right of victims of sexual assault and child victims to proceed by pseudonym. But do not be dissuaded from filing a motion to proceed by pseudonym if the victim does not have an express right; instead, argued that other rights support the victim proceeding by pseudonym, including the rights to: privacy; protection; access to the courts; be treated with fairness, dignity, and respect; and be free from intimidation, harassment, or abuse in the criminal justice process.



# WHY COMMUNITY PROSECUTORS SHOULD CARE ABOUT THE IMMIGRATION CONSEQUENCES OF CONVICTIONS

By:

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The United States Supreme Court has held that criminal defense counsel is constitutionally obligated to advise noncitizen defendants about the immigration penalties of guilty pleas and to defend against such consequences. But what is the role of the prosecutor when a noncitizen defendant faces the possibility of deportation? For community prosecutors, this question is timely and vital. Entire communities – and, frequently, victims – are impacted when a noncitizen defendant is deported. Current immigration enforcement efforts are unprecedented in scale and scope, and those caught up in the system often face penalties grossly disproportionate to the underlying criminal offense.

This article seeks to: present the various types of immigration penalties that flow from criminal charges; explore the ways in which these penalties raise community safety concerns; and discuss ideas for moving forward.

**What are the immigration penalties of criminal convictions?**

Federal immigration law provides for a variety of penalties for state and federal criminal convictions, including: deportation; detention, often with no mechanism for release on bond; the inability to travel internationally; and preclusion from future immigration benefits such as lawful permanent residence (a “green card”) or citizenship. Many criminal offenses automatically trigger deportation as a “mandatory minimum” punishment.

For example, automatic deportation is a mandatory minimum sentence for noncitizens convicted of an offense defined as an “aggravated felony” under immigration law. In many cases the definition is unrelated to any criminal definition and includes non-violent offenses and misdemeanors. Examples of such offenses include: a shoplifting offense with a one year suspended sentence; misdemeanor possession of marijuana with the intent to sell; or sale of counterfeit DVDs with a one year suspended sentence. Due to the mandatory nature of these punishments, noncitizens convicted of an aggravated felony are given a life sentence of exile (deported) without the opportunity for a judge to consider the individual circumstances of their case, such as whether the person is a longtime green card holder, has U.S. citizen family members, is a veteran of the U.S. military, is a refugee or asylee, owns a business, or has rehabilitated.

Lundy Khoy is an example of the mandatory and often grossly disproportionate immigration consequences imposed on noncitizens convicted of an aggravated felony. Lundy was born in a refugee camp in Thailand after her family fled the Cambodian genocide, and came to the United States when she was one year old. More than ten years ago, as a freshman in college, Lundy was caught with ecstasy on her way to a party and was convicted of possession with intent to distribute. She served three months of her sentence and was released by a judge for good behavior. Lundy completed four years of supervised

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probation without missing an appointment or failing a drug test. Now a grown woman who has continued her education and is a dedicated volunteer in her community, she has been ordered deported by an immigration judge on the basis of this conviction, without consideration of the individual circumstances of her case. Her family members, including her parents and two siblings, are all here in the United States living either as citizens or lawful permanent residents.

Any noncitizen of the United States – including longtime green card holders like Lundy and undocumented immigrants – may be subject to deportation because of a criminal conviction. This is true even for long-ago convictions for which the noncitizen was already punished under the criminal justice system and which may no longer exist on his or her state criminal record.

### **Why should community prosecutors be concerned with these immigration penalties?**

Deportation following a criminal conviction has significant and often devastating impacts on the emotional and financial well-being of innocent community members, including victims of crime. This creates vulnerabilities in the very communities prosecutors seek to protect. These impacts include the following:

- A defendant's deportation may result in the separation of a family, often including U.S.-born children. According to a recent report, 23% of all persons deported in the last two years were a parent of at least one U.S. citizen child. These children are left behind to be raised by a single parent, relatives, or the foster care system. In fact, at least 5,000 children are presently in foster care nationwide subsequent to the deportation or detention of a parent by Immigration and Customs Enforcement (ICE). Studies show that children left behind by deportation are more likely to engage in behavior that is both self-destructive and destructive to the larger community. In a study of children whose parents had been the subject of an immigration enforcement action, for example, nearly half began displaying "angry or aggressive" behavior that was persistent over the long term. Children raised in non-intact family homes, such as single parent homes or the foster care system, demonstrate significantly increased risks of incarceration

and illegal behavior. One defendant's deportation may, therefore, leave that defendant's child more vulnerable to future arrest and incarceration.

- In some cases, the defendant's deportation may have a negative impact on the victim of the underlying offense. In domestic violence cases, for example, the deportation of a defendant may leave the victim as a single parent without marital and/or child support. Similarly, in cases where restitution is a part of the sentence imposed, the defendant's deportation is likely to render him unable to pay and out of reach of the United States criminal justice system.

- Noncitizen defendants are often bread-winners whose deportation leaves their families facing economic crises, resulting in increased reliance on public benefits. In a recent study of families affected by immigration enforcement actions, common financial repercussions of deportation included food instability, loss of housing, and greater reliance on government assistance programs such as food stamps.

### **What role can prosecutors play?**

The Supreme Court of the United States has encouraged both the defense and the prosecution to bring immigration penalties into the plea bargaining process in order to "reach agreements that better satisfy the interests of both parties." Defense counsel and prosecution can then work together "to plea bargain creatively ... in order to craft a conviction and sentence that reduce the likelihood of deportation." Various options exist for the type of "creative plea bargaining" that the Padilla decision endorses, including:

- Alternative plea agreement: The defense and prosecution may agree to an alternative plea that is of a similar nature and severity to the originally charged offense, but minimizes the defendant's exposure to disproportionate immigration penalties.

- Alternative sentencing agreement: The defense and prosecution may agree to alter the sentencing component of the plea. For example, a sentence of 364 days rather than 365 days on certain offenses may avoid triggering mandatory deportation grounds, preserving for some defendants the opportunity to present the individual circumstances of their case to an immigration judge.

- **Modified record of conviction:** The prosecutor may modify the language included in documents in the court file that pertain to the criminal charges, conviction, or sentencing, so as to mitigate the potential immigration consequences of the conviction. The language included in these documents is often relevant to subsequent determinations of whether the noncitizen will face mandatory deportation. In cases involving fraud-related charges, for example, a plea to an offense that caused a loss to the victim of less than \$10,000 may provide some noncitizen defendants with a defense against an aggravated felony charge in immigration court, even if the defendant is directed to pay more than \$10,000 restitution.

- **Access to pre-plea treatment programs:** The defense and prosecution may work together to ensure that noncitizen defendants can participate in court-sponsored treatment programs, often referred to as deferred prosecution or diversion programs, without first entering a plea of guilty. Many treatment programs require the entry of a guilty plea prior to participation, triggering irreversible deportation consequences even if that plea is later withdrawn. Furthermore, many noncitizen defendants are precluded from participation in treatment programs entirely because of the presence of an immigration detainer. The defense and prosecution may work together to ensure access in such cases by advocating for ICE to lift the detainer.

Dr. Luis Zayas, Dean of the School of Social Work at the University of Texas, is one member of a team of researchers exploring the psychological effects of deportation on children left behind. Describing the depth of these effects, Dr. Zayas has stated that, “No parent should be put through such an anguishing decision of whether or not to leave a child behind, but most importantly, how will these kids feel about their government when they grow up?” Community prosecutors must take these concerns to heart when prosecuting noncitizens. Local lead prosecutors should ensure that their prosecuting attorneys have access to reliable sources of information and training regarding immigration penalties of convictions. And, most importantly, it is time for community prosecutors to establish a culture of awareness and compassion when considering the often disproportionate, mandatory, and harsh immigration consequences of convictions.

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***Her expertise is on the immigration consequences of crime and delinquency. She regularly provides immigration trainings and technical assistance to indigent defenders, prosecutors, criminal and juvenile court judges, and law enforcement officials. She is a co-author of numerous publications including ILRC’s Defending Immigrants in the Ninth Circuit: The Impact of Crimes under California and Other State Laws and Immigration Benchbook for Juvenile and Family Courts. She sits on the American Bar Association’s Immigration Commission and is the co-chair of the Immigration Committee of the ABA’s Criminal Justice Section.***

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