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The Effectiveness and Enforcement of a Teen Curfew Law

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This article examines the effect of a teen curfew on juvenile arrest rates and reviews the first year of the curfew's implementation in a city of over 200,000 population. Juvenile arrest rates were compared for three years prior to the curfew's enactment and three years of curfew enforcement. Data related to 377 curfew violations and 83 parent citations issued in 22 police beats during the first year of implementation were analyzed to determine whether the curfew was primarily enforced in areas with serious juvenile crime or targeted low income, minority neighborhoods. Results indicate that the curfew had no effect on total juvenile arrests, felonies, misdemeanors, violent (serious) crimes, or property crimes. More curfew violations were issued in areas with higher rates of juvenile arrests, higher levels of police presence, and lower family incomes. Parental citations were highest in areas with lower family income and greater proportions of African American populations.

Introduction

In the period from 1988 to 1993, the rates of violent crimes such as homicides, rapes, assaults, and robberies committed by teens rose more than 60%, and murder-related arrests of teens nearly doubled (Snyder and Sickmund, 1995; Seibert, 1995). Nearly two million juveniles were arrested in the United States in 1992; 84% of them were arrested in urban areas (FBI Uniform Crime Reports, 1993; Marketos, 1995).

In the late 1980's and early 1990's, the citizens of many cities were alarmed by the increasing incidence of serious crime by

juveniles and looked for ways to respond quickly and effectively to this threat. The administrators of many cities reached for an old solution to a current problem: a teen curfew. Teen curfews attained modest popularity in the 1970's in response to rising rates of juvenile crime during that period. In the 1990's they enjoyed renewed and increased popularity. In 1990, 93(47%) of the 200 American cities with populations of 100,000 or more had curfews in place. By 1995, 146 (73%) of these cities had enacted and implemented teen curfew laws (LeBoeuf, 1996; Ruefle and Reynolds, 1995). In 1994, there were as many as one thousand American cities of all population sizes with teen curfews (Ruefle and Reynolds, 1995).

This study examines the relationship of a recently enacted teen curfew law in a mid-sized city of more than 200,000 population to juvenile arrest rates, and it analyzes the enforcement of the curfew during its first year of use in regard to factors associated with curfew violations and parental citations. These relationships are examined in relation to the arguments in favor of teen curfews and the concerns expressed by opponents of these curfews.

Background

Teen curfew laws restrict the hours that juveniles may be on the streets or in public places at night. A teen curfew is justified in many cities or municipalities as a simple method to not only reduce opportunities for teens to commit crimes but also to protect them from becoming crime victims. Curfews are promoted as beneficial to law enforcement; they give police additional control over the presence and behavior of juveniles on the street during curfew hours. They are also endorsed as a valuable complement to parental supervision; they provide community support to parents placing limits on the hours that their children may be out at night (Ruefle and Reynolds, 1995; Seibert, 1995).

In many cities, curfews have been introduced by government officials as credible and effective community-based responses to increases in serious juvenile crime. Curfews have been touted as particularly useful in high-crime neighborhoods or communities. In some areas they have been endorsed primarily as a strategy to

limit the late-night activities of juvenile gangs. Curfew laws have become increasingly important instruments of the crime control or "just deserts" approach to juvenile justice, which emphasizes accountability and more severe sanctioning of juvenile offenders. This approach has largely supplanted the rehabilitative justice model that dominated juvenile justice since the early 20th century (Feld, 1990; Krisberg, Schwartz, Litsky, and Austin, 1986; Ruefle and Reynolds, 1995).

As more communities have adopted teen curfews, many critics have questioned their viability and legitimacy as crime fighting tools. The questions raised most often in regard to the use and implementation of these curfews are: 1) How effective are curfews as crime prevention measures? 2) What is the relationship of juvenile crime, particularly serious juvenile crime, to the use and enforcement of teen curfew laws? 3) Are teen curfew laws fairly implemented and enforced, or do they target low income, minority neighborhoods? 4) Does the enforcement of curfews violate the rights of juveniles? This study explores these questions in relation to one city's enactment of a teen curfew law.

Literature Review

The literature on teen curfews is limited to several articles in law journals, two outcome evaluations, a multitude of newspaper stories, and a recent survey on curfews in the nation's largest cities. This literature has reviewed and evaluated the legal issues associated with various court cases challenging teen curfew laws. These lawsuits have essentially argued that curfews violate the constitutional rights of juveniles and negate the child rearing rights and responsibilities of parents. Constitutional questions concerning violations of the Equal Protection Clause, First Amendment rights, and 14th Amendment guarantees of due process have been raised most often.

Legal challenges have prompted lawmakers to rethink and reshape curfew laws to address and protect essential juvenile rights. Comprehensive and precise language defining the key terms in these laws is intended to provide clear definitions of prohibited behavior (Marketos, 1995, Seibert, 1995). "Exceptions" to the restrictions that the law places upon various juvenile behaviors

have been added to prevent curfews from violating First Amendment rights of free speech, association and assembly, religious expression, and unrestricted travel (Johnson, 1995; Horowitz, 1991; Marketos, 1995). Consistent standards of enforcement, including a mandatory enforcement requirement, have been appended to some curfew laws to forestall claims that they involve arbitrary and discriminatory application (Marketos, 1995, Seibert, 1995).

Courts have generally upheld as constitutional the government's claim of having a compelling interest in passing teen curfew laws in response to rising juvenile crime (Hananel, 1994; Qutb v. Strauss, 11 £ 3d 488 1993). However, cities have not been required to present evidence to the courts indicating that curfews have actually been instituted in response to the juvenile crime problem. There has also been no requirement to provide evidence that curfews have curtailed crime or reduced juvenile victimization in cities where they have been adopted (DeLucia, 1995; Johnson, 1995; Marketos, 1995; Seibert, 1995; Lester, 1996). Indeed, the research literature is nearly bereft of studies examining the effects of curfews on crime, the community, or youth offenders (Ruefle and Reynolds, 1995). The claims in several high profile cities such as Denver, San Antonio, and New Orleans that serious juvenile crime decreased 30 to 60 percent in their areas following the adoption of curfew laws have been based on anecdotal evidence, rather than systematic data collection and analysis (Siebert, 1995). The national rates of violent juvenile crime that had climbed so steeply from the mid-1980's to 1993 and were instrumental in the reemergence of teen curfew laws have declined rather sharply since 1995 (Sickmund et al., 1997). There are only two studies that have examined the link between curfews and changes in rates of juvenile arrests.

A dated curfew outcome study (Hunt and Weiner, 1977) examined the effects of a summertime curfew law in a large Midwestern city. Rates of serious crimes (rape, robbery, burglary, etc.) committed by juveniles during the month of August were calculated for the four years prior to adoption of the summer curfew and compared with rates after the curfew took effect. The findings suggested that crime rates were reduced during curfew hours. However, there was also some evidence of"crime displacement",

that is, an observable increase in criminal activities during the afternoon hours when the curfew was not in effect.

A recent study examined whether rates of curfew arrests were associated with rates of juvenile arrests on a year-by-year basis from 1978 to 1996 for the state of California (Males & Macallair, 1999). Categories of youth crimes examined were: all arrests, felonies, violent felonies, homicides, property felonies, and misdemeanors. A statewide analysis revealed that curfew arrests were generally unrelated to juvenile arrest rates, although they were associated with higher rates of misdemeanor arrests for all youth and specifically for whites, Hispanics, and Asians. Curfew enforcement was related to higher rates of violent crime by Asian youth, and higher rates of all types of crime for Asian and white youth.

The twelve most populous counties in California were examined for the 1980–96 period. Again, curfew arrest rates were generally unrelated to youth arrest rates overall, but were positively related to arrests for misdemeanors. In four counties, curfews were associated with higher rates of both violent and property crimes. Most significantly, none of the counties with the highest rates of curfew enforcement showed a significant decrease in juvenile arrests for any kind of crime. The authors concluded that their analysis of teen curfews in California did not support the contention that curfew enforcement is related to reductions in any kind of juvenile crime (Males & Macallair, 1999).

Ruefle and Reynolds (1995) reviewed more than 160 newspaper stories about curfews which appeared during 1993 and part of 1994. They found that the rationale for adoption of curfews in most cities was to reduce juvenile crime and crime victimization. Several cities were reported to have adopted curfews both as a hedge against the geographical displacement of juvenile crime to their cities from other areas and as part of a "domino effect" when surrounding cities and municipalities passed them. At the time of the survey, three major American cities (Denver, Phoenix, Orlando) had adopted city-wide curfews that had specific application to "hot spot" high crime areas.

Ruefle and Reynolds (1995) also conducted a telephone survey of police departments in the 77 cities in the United States with populations of 200,000 or more to determine the extent and

content of their curfews. Fifty nine (77%) of these largest cities had curfew ordinances by mid-1994. Of these cities, 33 (56%) had curfews enacted prior to the 1990's, and 26 (44%) had adopted them for the first time between 1990 and 1994. Many of the cities with longstanding curfews had revised their ordinances during the early 1 990's.

Although there are no national crime statistics that specify the number of annual curfew violations, the FBI crime statistics include a category which groups curfew and loitering violations. In 1992, there were 91,100 youths cited for these offenses. This seems to be a high number when compared to the 129,600 youth arrested in the same year for all violent crimes (FBI Uniform Crime Statistics, 1994). By 1995, curfew and loitering violations had risen to 149,800, surpassing the incidence of all violent crimes (147,700) (Sickmund, Snyder, & Poe-Yamagata, 1997). The most recent figures indicate that curfew/loitering violations had reached 183,000 in 1997, more than double the rate from 1992 (Snyder, 1998).

Critics of teen curfews have argued that they have little impact on serious juvenile crimes, citing statistics indicating that most of these offenses occur in the after-school hours before parents return home from work (Seibert, 1995). Approximately 57 percent of all violent juvenile crime occurs on school days; 20 percent of it occurs between 2:00 p.m. and 6:00 p.m. Serious violent crimes by juveniles peaks at 3 p.m. on school days, and it peaks in the evening between 8:00 p.m. and 10:00 p.m. on non-school days (Sickmund et al., 1997; Snyder & Sickmund, 1999). The rate of violent crimes committed by juveniles is four times greater in the afterschool hours than in the usual curfew period. The potential for efforts to be successful in reducing a community's juvenile violent crime rate are greater if they target youth in the hours immediately after school as compared to the late-night hours typically covered by juvenile curfews (Snyder & Sickmund, 1999).

Critics of teen curfews have also voiced the suspicion that these laws are enforced in an arbitrary and discriminatory fashion, targeting youth in low income, minority neighborhoods. It is feared that if broad enforcement discretion is granted to police, they will use the curfew as a pretense to detain and question youth, particularly minority youth. Studies examining police decision-making practices suggest that this concern is justified.

Results indicate that numerous extra-legal factors contribute to the increased likelihood of juvenile arrest. These factors include: social class, race, demeanor, and area of residence of the offender; presence of co perpetrators; and general police department policies and deployment practices (Fisher and Doyle-Martin, 1981, Smith and Visher, 1981; Sutphen, Kurtz, and Giddings 1993). Critics argue that curfews are merely another law enforcement weapon that will be misused by police to cite youth for curfew violations when they are suspected of committing other crimes but there is insufficient evidence for an arrest (Federale, 1995; Ford, 1994; Ruefle and Reynolds, 1995).

Study and Curfew Parameters

This study examines the relationship of a teen curfew to rates of juvenile arrests, and how the curfew law was enforced during a one year period following its implementation in 1995 in a city with a population of 230,000 (1990 Census). The city contains a predominantly Caucasian population (85%), with African Americans making up 13.4% of the total. There are approximately 34,000 youth between the ages of 5 to 17 in the city; approximately 80% of this age group are Caucasian; about 18% are African American.

The curfew law was adopted in response to a reported increase in serious and violent juvenile crime (murder, rape, assault, and burglaries) in the city over the past several years. Its stated purpose was to reduce juvenile crime and violence (Tolliver, 1994).

The curfew law applies to all youth 17 years of age and younger, from 11 p.m. to 5 a.m. week nights, and from 1 a.m. to 5 a.m. on weekend nights. The law contains several exceptions to violations including youths who are: accompanied by a parent or other authorized adult; exercising first amendment rights (religion, speech, assembly); cases of reasonable necessity; standing on the sidewalk in front of their residence; returning home within an hour of a school, religious, or voluntary activity; engaged in employment activity; in a motor vehicle with an authorized driver; operators or passengers of a motor vehicle in direct route to a destination within or out of the city limits; married; or homeless and using a public place as an abode. The

law also contains a provision to cite the parents of youth violators if they permit the youth to violate the curfew or fail to prevent the youth from violating the curfew. Cited parents face a fine of up to $499. Enforcement of this provision is left to the discretion of the police officer.

Methods

Data were collected from police department records of juvenile arrests for the periods 1992–1998. The curfew was implemented in May 1995, so this data provided comparison information regarding juvenile arrests for three years prior to and three years post curfew implementation. Data collected contained total juvenile arrests, felonies, misdemeanors, violent crimes (homicide, assault, robbery, rape), and property crimes (burglary, larceny, auto-theft, arson). Data were also collected from police reports for the first year of the law's implementation (May 1995–April 1996). Police reports provided information about the date, time, and police beat location of each curfew violation. These reports contained information about each offender's gender, race, and age, whether the offender had prior curfew violations, if co-perpetrators were present, and whether weapons or drugs were involved. These reports also noted whether a juvenile's parents were cited. A "circumstances" section of the report revealed additional information for each citation, including the mobility status of the youth (on foot or in vehicle), presence of adult(s), and the decision by police to make an additional charge against the youth (or accompanying adult) when an offense in addition to the curfew violation was observed or suspected.

The police department provided summary data for each of 24 police beats in the city: 1996 juvenile arrests for all crimes and for serious crimes (homicide, rape, assault, robbery) and police deployment (man-hours) during curfew hours. The police beats, with a few exceptions, coincide with groupings of from two to four of the fifty-five census tracts in the city. Census tract figures from the 1990 Census regarding race, income, and other variables were combined in their respective police beat areas to obtain demographic profiles for each police beat. Data for two police beats were combined because they fell into one census tract, one

police beat could not be reliably matched to census tracts and was not included in the data analysis. Thus, results are reported for 22 police beats.

Results

Pre-and-Post Curfew Juvenile Arrests

As shown in the Figure, implementation of the curfew in 1995 did not appear to have an immediate marked effect on juvenile crime rates in any of the categories. Table 1 presents year by year figures for various types of crimes committed by juveniles. Standard crime rates were calculated by dividing the number of crimes reported in each category by the estimated juvenile population for that year and multiplying the result by 10000.

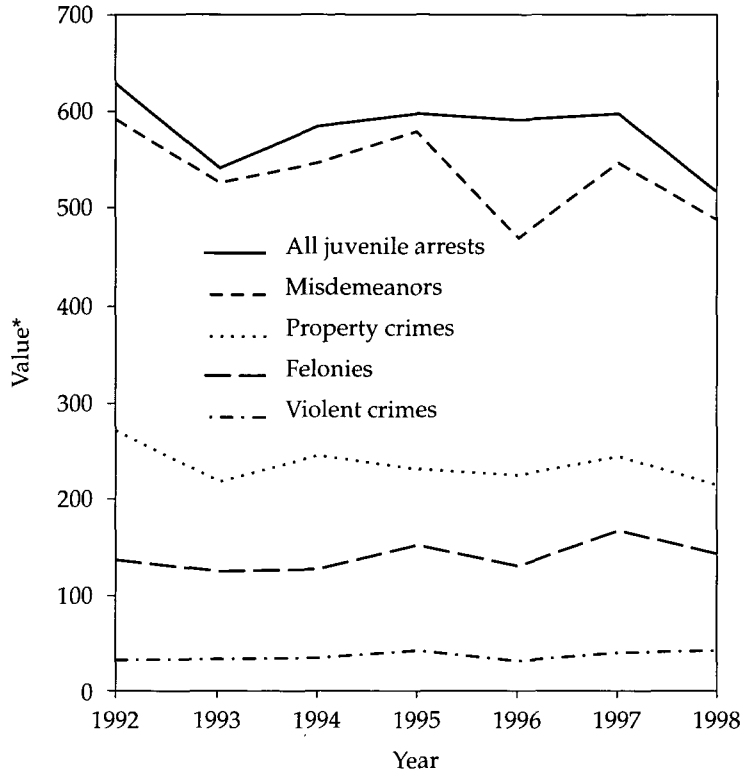
The crime rates for each category fluctuated year by year, but did not appear to be related to the implementation of the curfew. Mean rates of each category of crime were calculated for the periods of 1992–1994 and 1996–1998. Comparisons of mean pre-and-post curfew crime rates were conducted for each crime category using both independent t-tests and Mann-Whitney tests. Overall, the mean number of arrests per juvenile population decreased by 15 arrests per 10,000 juveniles, but the difference was not statistically significant. Poisson regression analysis comparing 1998 incidents of juvenile arrests per juvenile population to those in 1992, 1993, 1994, 1996, and 1997 found that 1998 had significantly lower overall incidents for every year except pre-curfew 1993.

Comparisons for individual arrest categories indicated that while mean rates of arrests for misdemeanors and crimes against property decreased slightly from pre-curfew to post-curfew, there was a slight increase in mean rates for violent crimes and felonies. None of the differences was statistically significant.

Youth Curfew Violations During the First Year of Implementation

Three hundred and seventy-seven citations for curfew violations were issued in the first year of the curfew law. The offending youths were primarily male and Caucasian. Thirty percent of the offenders were African American compared to 18.3% of the juvenile population in the city (U. S. Census, 1990); African American youths were over-represented in the population of offenders

Figure 1
Juvenile Arrest Rates by Category of Crime: 1992–1998



* All figures are rates per 10,000 population.

(chi-square=4.11; df=1; $p<.05$). Most of the violators were between 14 and 17 years of age; their average age was 16. Only a small number of the cited youth had prior curfew violations when they were apprehended. Citations by month ranged from 54 issued in July to only 13 issued in December. Over half of them occurred in the warm weather months from May to August, during the schools' summer recess.

The circumstances under which the citations were issued varied greatly. The vast majority of the juveniles (84%) were cited

Table 1

Juvenile Arrest Summary Per 10,000 Juvenile Population: 1992–1998

Year	*1992*	*1993*	*1994*	*1995*	*1996*	*1997*	*1998*
All juvenile arrests	630	541	586	599	594	600	518
Felonies	137	126	129	153	133	169	148
Misdemeanors	594	526	549	582	472	550	492
Violent crimes:	31	35	37	46	33	44	48
Homicide	1	0	1	1	0	0	1
Assault	18	19	19	28	22	29	35
Robbery	7	9	13	13	10	11	11
Rape	5	7	4	4	1	4	1
Property crimes:	269	218	245	232	225	246	219
Burglary	39	34	32	24	26	35	39
Larceny	224	176	208	202	197	198	169
Auto-theft	6	7	4	5	2	12	10
Arson	0	1	1	1	0	1	1
Drug related crimes	28	45	53	76	51	42	39
Alcohol related crimes	49	33	42	40	21	31	41
Firearms related crimes	15	8	14	14	7	13	18
Traffic offenses	28	22	25	31	14	11	20

in groups with one or more co-perpetrators. Nearly one third of the curfew violators were cited in the company of young adults. Most of the violators were on foot (63%) with the remainder in vehicles when they were apprehended.

In two thirds of the cases, other crimes committed by juveniles or adult companions were either observed by the police or suspected to have occurred. Weapons were involved in only 23 of the situations, but drugs or alcohol were involved in over a quarter of them. The most prevalent offenses associated with curfew violations involved either alcohol or drugs, theft or attempted theft, escape attempts, or disorderly conduct. One incident of assault and two of robbery were the only serious violent crimes associated with the enforcement of the curfew.

The most frequent curfew violation scenario encountered by the police involved two or more juveniles walking the streets or "hanging out" in public places. This was the circumstance under which a quarter of the cases were cited: no other crimes, weapons, adults, or previous curfew violations were involved. This type of scenario was reported for 1 in 5 citations of Caucasian youths, and for 1 in 3 citations of African American youths.

Parental Citations

Parents of youth curfew violators may also be cited at the discretion of the arresting officer. The city curfew law grants police the option of assessing the extent to which parents of curfew violators either permitted or failed to prevent their child's curfew violation. Parents were cited in 83 (22%) of the 377 curfew violations. The parents of males were cited much more frequently (69) than females (14), but in essentially equal proportions to the distribution of curfew violations by gender. The police issued 60% of the parental citations to parents of Caucasian youth and 39% to parents of African American youth. Again this was a significantly higher proportion of African Americans than the 14% represented in the overall population (chi-square=17.31; df=1; $p<.01$).

Parents were cited more often when curfew violators had prior curfew violations (34% vs. 14% of the total group; chi-square=18.83; df=1; $p<.0l$); possessed a weapon (17% vs. 6% of the total group; chi-square=10.66; df=1; $p<.01$); or when drugs or alcohol were involved (52% vs. 28% of the total group; chi-square=18.35; df=1; $p<.01$). Parents of curfew violators were cited in one third of the situations when the youth or an associate were charged with other offenses. The most frequent offenses associated with parental citations were: alcohol intoxication, possession of marijuana, and eluding police.

Analysis by Police Beat

Initial analysis of the individual curfew violations suggested a differential in the way that the curfew law was applied to Caucasian and African American youth. It appeared that a disproportionate number of African American youths and their parents were cited for curfew violations in the first year of implementation. Further analysis was done to examine enforcement of the

Table 2

Curfew Violations and Parent Citations During the First Year of Implementation: Offender Characteristics, Situational Factors, and Additional Charge

		Curfew Violations (N=377)		*Parent Citations (N=83)*	
Offender Characteristics		*n*	%	*n*	%
Gender	Male	304	80.6	69	83.1
	Female	73	19.4	14	16.9
Race	Caucasian	259	68.7	50	60.2
	African American	114	30.2	32	38.6
Age	13–15	140	37.8	30	37.0
	16	125	33.8	24	29.6
	Over 16	98	26.5	26	32.1
Prior Violations		52	13.8	28	33.7
Situational Factors					
Presence of Associates		318	84.4	71	85.5
Presence of Adults		125	33.2	28	33.7
Mobility Status					
	On foot	238	63.1	46	55.4
	In Vehicle	125	33.2	37	44.6
Drugs or Alcohol Involved		104	27.6	43	51.8
Weapon involved		23	6.1	14	16.9
Additional Charges					
Alcohol Intoxication		36	9.5	11	13.3
Eluding police		31	8.2	9	10.8
Possession of Alcohol		16	4.2	6	7.2
Possession of Marijuana		14	3.7	10	12.0
Disorderly conduct		15	4.0	4	4.8
Theft or attempted theft		28	7.4	0	
Possession of Contraband		13	3.4	0	
Runaway		12	3.2	0	

teen curfew law in relation to juvenile arrest rates and to investigate whether its enforcement appeared to target low income, minority neighborhoods.

Data for 22 police beats were analyzed to examine whether curfew violations and parental citations issued in each of the police beat areas appeared to be related to other variables such as juvenile arrest rates, African American population, juvenile population, income, and police presence during curfew hours. Initial examination showed that the 22 police beats varied greatly in size, population, and in regard to each of the other variables. The number of persons residing within a police beat ranged from 2,307 to 20,344. The number of curfew violations per beat ranged from 2 to 40 (mean=17); the number of parental citations ranged from 0 to 14 (mean=4).

In order to make comparisons among the police beats, all raw numbers were converted to rates per population of the police beat. In addition, the numbers of curfew violations and parental citations were recalculated to reflect "incidents" rather than "individuals". Violations which resulted in two or more youths being cited at the same time for the same activity were counted as one violation incident; likewise if the parents of these youths were cited as a result of the same violation incident, only one incident of parental citation was counted (Michener and Tighe, 1992). Table 3 shows rates per population of police beat; there was still enormous variation among police beats on all the variables.

Incidents of youth curfew violations per 10,000 population ranged from 1.18 to 56.35 among the police beats. Incidents of parental citations ranged from 0 to 24.91 per 10,000 population. Figures on juvenile arrest rates included overall juvenile arrests and juvenile arrests for serious crime in 1996. Juvenile arrest rates ranged from 17.88 to 237.07; juvenile arrests for serious crimes (homicide, rape, assault, robbery) ranged from 1.97 to 36.45 per 10,000 population. Police man-hours during curfew per 10,000 population ranged from 12.4 to 226.83. The percentage of the population aged 5 to 17 years of age per police beat area ranged from 1% to 43%. The percentage of African Americans in the population ranged from 2% to 68%. Median family income ranged from $13,848 to $60,987 across the police beats.

Bivariate correlations were run to determine if the variables appeared to be significantly related. The correlation matrix is

shown in Table 4. The correlation coefficients indicate that both violation incidents and parental citation incidents per police beat were positively related to juvenile arrest rates and police man-hours, and negatively related to median family income. Although percentage of African American population was not significantly correlated with either violation or parental citation incidents, it was significantly correlated with the variables of police man-hours, juvenile arrests, and median family income. The results suggest that the curfew law was being applied more stringently in low-income areas, which had more police presence, more arrests of juveniles, and a higher percentage of African American citizens. The relationships among variables were not clear, therefore a loglinear regression model was used to predict rates of curfew violation and parental citation incidents.

The Poisson regression model was used to test whether the dependent variables, curfew violation incidents and parental citation incidents, were predicted by the independent variables of percent of African American population, median family income, police man-hours, and juvenile arrest rates. The Poisson regression model is generally used to estimate a rate or incidence of occurrences of phenomena in a population during an interval of time and to determine the relationship of the rate to a set of explanatory variables (Stokes, Davis, and Koch, 1995; Michener and Tighe, 1992). The Poisson loglinear model can be used to "encompass responses such as counts and proportions" (Stokes et al., 1995, p. 472) The dependent variables in the study model are counts: incidents of curfew violations and parental citations, offset by the log of the population per police beat. The explanatory variables are proportional, and in this case, categorized according to their respective distributions in the police beats in order to more precisely examine the relationships between the dependent and independent variables.

The model used to predict incidents of curfew violations included the variables: juvenile arrests and police man-hours per police beat population, percent of African American population, and median family income. The offset was the log of the population for each police beat. The results indicated a satisfactory fit: Pearson chi-square=15.16; deviance=15.34; df=10. Three of the explanatory variables in the model: juvenile arrests, police man-hours, and median family income were found to

Table 3

First Year of Curfew Implementation: Violations and Parent Citation Incidents, Juvenile Arrest Rates, Police Man Hours, and Demographic Variables by Police Beat

Police Beat	Curfew Violations Incidents*	Parent Citations Incidents*	Juvenile Arrests*	Juvenile Arrests for Serious Crimes*	Police Man-hours*	Percent African-American Population	Percent Juvenile Population	Median Family Income
1	56.4	26.0	237.1	13.0	206.7	25.2	23.2	$13,848
2	49.8	17.8	192.1	10.7	226.8	44.9	35.8	$15,486
3	28.2	2.6	227.8	10.2	64.9	46.6	22.2	$15,519
4	21.1	9.6	209.1	36.5	155.8	26.3	18.8	$17,540
5	17.2	4.3	196.1	11.5	173.4	56.8	24.1	$25,795
6	15.8	6.3	108.3	11.9	30.6	18.0	19.3	$32,662
7	11.7	2.4	152.6	8.2	33.5	3.5	20.5	$31,737
8	11.0	3.0	93.8	7.0	38.4	60.3	31.8	$35,420
9	10.7	1.8	72.9	2.7	34.4	9.1	22.7	$31,553
10	9.3	2.1	92.9	6.2	12.4	4.0	24.1	$40,623
11	9.1	0.7	121.5	9.8	20.3	4.2	18.7	$30,025
12	8.9	0.6	17.9	2.4	30.3	1.6	1.1	$60,987
13	8.8	2.9	100.0	2.9	37.9	10.2	43.0	$32,715
14	8.7	0.0	168.7	17.5	215.7	67.8	26.1	$15,785
15	8.3	0.7	50.5	5.5	26.4	1.5	18.6	$35,062

16	6.9	2.8	80.0	6.9	13.4	14.6	20.5	$27,366
17	6.9	0.0	42.3	2.0	25.4	3.2	5.8	$29,062
18	6.7	2.4	172.1	4.3	18.6	2.0	29.4	$57,529
19	6.4	4.3	163.2	25.8	68.0	13.2	24.1	$22,687
20	6.1	2.0	66.7	8.1	13.7	9.6	26.9	$35,714
21	3.0	1.5	25.6	6.4	19.0	8.0	27.9	$43,681
22	1.2	0.0	30.8	2.4	51.4	1.9	17.8	$48,297
Total	10.6	2.8	96.4	7.7	44.3	19.7	22.8	$31,777

* Figure per 10000 population.

Table 4

First Year of Curfew Implementation: Correlations of Police Beat Variables

	Curfew Violation Incidents	*Parent Citation Incidents*	*Juvenile Arrests*	*Juvenile Arrests for Serious Crimes*	*Police Man-hours*	*Percent African-American Population*	*Percent Juvenile Population*
Parent Citations	.924**						
Juvenile Arrests	.681**	.603**					
Juvenile Arrests for Serious Crimes	.261	.345	.608**				
Police Man-hours	.712**	.670**	.691**	.521*			
% African-American Population	.405	.257	.560**	.354	.691**		
% Juvenile Population	.196	.242	.330	.053	.222	.350	
Median Family Income	−.598**	−.511*	−.674**	−.581**	−.659**	−.585**	−.246

Curfew violations, parent citations, juvenile arrests, juvenile arrests for serious crimes and police man-hours are per 10,000 population.

* Significant at p=.05.

** Significant at p=.01.

be significantly ($p \leq .05$) related to curfew violations or to have significant effects on the model. Percent of African American population was not a significant variable in predicting incidents of curfew violations, although removing it from the model weakened the overall model slightly. The individual chi-square values and their significance levels are shown-in Table 5. The main effects for the variables of median family income and juvenile arrest rates appeared to be in comparing the "high" and "low" categories, with the largest differences being noted between the police beats with the highest and lowest median family incomes and highest and lowest juvenile arrest rates. For the variable of police man-hours, the lowest category of police man-hours (0–25 per 10,000 population) was the reference cell, and significant differences were noted in comparisons with all of the other three categories. These results suggest even more strongly that the curfew law was applied more stringently in low-income areas, which had more police presence and more arrests of juveniles; the percentage of African American citizens did not appear to have a direct effect on curfew violations.

The model used to predict incidents of parental citations included the variables: percent of African American population and median family income. The offset was the log of the population for each police beat. The results indicated a satisfactory fit: Pearson

Table 5

Likelihood Ratio Statistics for Poisson Regression Model Predicting Incidents of Curfew Violations

Independent Variable	*DF*	*Chi-Square*	*Probability*
% African-American population	3	4.79	0.1875
Median Family Income	2	8.68	0.0130*
Police Man-hours per 10,000 population	3	19.59	0.0002*
Juvenile Arrests per 10,000 population	3	20.05	0.0002*

* Significant at $p < .05$.

chi-square=20.24; deviance=24.20; df=16. Both of the explanatory variables in the model had significant effects: the individual chi-square for percent of African American population=13.87 (df=3, p.=0.0031), and the individual chi-square for median family income=12.43 (df=2, p=0.0020). Adding the other independent variables to the model did not improve the fit. These results suggest that parents were more likely to be cited when violations occurred in low-income areas with the highest percentage of African American population.

Discussion

The primary aim of this study was to examine the relationship of a teen curfew to rates of juvenile arrests and to analyze the first year of the use and enforcement of the curfew in a mid-southern city in relation to variables and concerns identified by proponents and critics of teen curfews. The results indicate that at least some of the concerns voiced by critics of teen curfews appear to be justified.

As in most cities that have adopted curfew laws, the curfew examined in this study was implemented in an effort to counter a reported increase in serious juvenile crime. The findings indicate that the curfew was not associated with significant changes in the juvenile arrest rates for any kind of crime including serious (violent) crimes. There are many apparent trends or peaks in the arrest data that would seem to suggest that arrests for certain kinds of offenses have increased or decreased since the enactment of the curfew, however the overall variance in the arrest patterns were so great that no significant effects were found. For example, total juvenile arrests were at their lowest point in 1998, but were barely less than the rate in pre-curfew 1993. Arrests for misdemeanors were at their lowest point in 1996 and felony arrests peaked in 1997. Likewise, arrests for violent crimes were never higher than in 1998. Results of the study indicate that the curfew did not significantly target or impact serious (violent) juvenile crime.This is consistent with the conclusions reached by the OJJDP that most violent crimes committed by juveniles do not occur during curfew hours (Snyder and Sickmund, 1999). One of the limitations of this study is that it only covers three years of curfew implementation.

However, it seems unlikely that a longer period of evaluation will reveal different results in terms of the curfew's association with arrest rates.

Review of the first year of curfew implementation showed that citations were more likely to be issued in police beats with the highest rates of total juvenile arrests but not consistently in the beats with the most arrests for serious (violent) offenses. As one may observe in Table 3, two beats (14 & 19) were among the highest for serious crimes, but had very low rates of curfew violations. As reported in Table 2, examination of police reports indicated that the additional charges most associated with the curfew did not include assault, rape, or other violent crimes . During the first year of the curfew only two incidences of violent crimes were reported by police when enforcing the curfew.

The relationship between the curfew and juvenile crime does not appear to be a causal one. Both are enforced in the same areas of the city (police beats), but it has not been demonstrated that the curfew has any effect upon rates of juvenile arrests. The beats with the most curfew citations were generally the small, densely populated, inner-city areas with many low-income minority residents and high police presence, as contrasted with much the more expansive suburban beats which had the fewest citations. Higher rates of violations were probably a result of greater police presence in smaller geographical areas where more crime was anticipated. Youth in these areas may not have as many places to "hang out" that are less visible to police, or they are less mobile and therefore more visible than their youthful counterparts who live in suburban areas.

Critics of curfews have claimed that they are nothing but an additional law enforcement device used by police as a pretense to detain, question, and charge youth in low income, minority neighborhoods. The findings of this study suggest that the primary value of the law has been to provide police with an additional charging mechanism. However, without the benefit of a situational study, it would be difficult to know whether or how the curfew was used as a pretext to stop or detain youths suspected of criminal activity. It could be that youths are stopped for curfew violations and then evidence of criminal activity is discovered, leading to arrest on criminal charges. Conversely, it could be that

youths are stopped for reported or suspected criminal activity and are charged with curfew violations when the alleged criminal activity cannot be substantiated by police. A third possibility is that the curfew offers the police an additional charging option when the associates of apprehended youth have been arrested for committing crimes.

The highest rates of curfew citations occurred in areas of the city with the lowest median family incomes and the greatest African American population. The fact that median family income was found to be a stronger predictor of curfew citations than the percentage of African American population was not unexpected in a city with an 80% Caucasian population. While most of the city's African American citizens reside in the police beats with the highest curfew violations, the majority of the residents in most of these areas are Caucasian. The percentage of African American population, however, was a stronger predictor of parental citations. Although parental citations appeared to be related to the seriousness of the circumstances surrounding curfew violations, the parents of African American youths were more likely to be cited by police than the parents of Caucasian youths with similar circumstances. These findings are suggestive of discriminatory enforcement and are consistent with a substantial body of literature that has documented racial and social class-based disparity in many aspects of the juvenile justice system..

The legal justification for the enactment of this teen curfew law as well as those in other municipalities has been predicated on its potential for crime prevention. At present, this has yet to be demonstrated through research findings in this city or others. Future research must continue to examine this relationship in order to address the underlying question of whether there is a "compelling interest" to criminalize the nocturnal activities of teens. Many local governments and the courts have been all too ready to accept the deterrent value of curfews without the benefit of supporting evidence. The logic implicit in the adoption of curfew laws is suspect; that the appropriate response to an increase in crime is to create a new crime. Curtailing the late-night activities of youth in public places is not likely to reduce arrest rates for serious crimes if the majority of these crimes do not occur during this time period. The extensive embracement of

this policy on the national level has spawned curfew violations and loitering as the fastest growing juvenile offense category in America. It still remains to be shown that there is a concomitant decrease in violent juvenile crime. Ultimately, the question to be answered is whether limited resources are being poorly utilized on enforcing curfew laws that may violate the rights of juveniles and their parents when they could be better used on after-school programs that may have much greater potential to reduce serious juvenile crime.

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