

Alaska Justice Forum

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The Future For Criminal Justice

By John E. Havelock
Dir. Criminal Justice Center

When a person living away from the city catches a fish and hangs it up to dry and another person comes along and takes it—that is a "rip-off." Even if the owner has been hungry for a long time and the fish is one of only three caught that week, it is an unrecorded and soon unremembered incident.

But, if a person buys some shares of stock, a house, a car, a snowmobile and a television set, and someone walks off with the television set—that is a "theft."

Partly this is because it is industrial society property, but more significantly, an increase in the amount of property increases the number of opportunities for misappropriation.

More property means more theft.

As a person accrues property, his expectations in protection also rise. He wants a policeman to protect him or to retaliate against any who wrong him and he will report offenses against him as "crime."

Rural Crime to Increase

For these reasons we can predict a rapid increase over the next decade in rural crime in Alaska—or reports of rural crime—and a proportionate increase in demands for and provision for police and other justice services in rural Alaska.

Change in the area of crime and the administration of justice is seldom self-generating but occurs in response to other changes in society, particularly in economic growth and social structure. Thus Alaska, the growth state, will experience a growth in crime and demand for justice services.

In the urban areas, this rise will be slight, proportionate to the increase in population, as it has been for the past several years. Despite widespread perception of an increased crime rate, increases are modest. The real overall increase, which is substantial, reflects only population growth of the state.

If anything, the urban crime rate will decrease in coming years as a result of a drop in the proportion of 15-24-year-olds in the population. Reduced unemployment, as Alaska continues its slow progression from a boom and bust economy, also will depress the crime rate.

Of course, crime is our name for many varieties of disapproved behavior, each of which occurs for different reasons. So, overall crime level stability depends on how we weigh the seriousness of each category of offense. The profile of crime will change—some offenses will increase and others decline.

Definitions of Crime Will Change

Crime is created or disappears, in part, by societal definition. For better or worse, there are few reasons to suppose that the trend to a more libertarian view of human behavior will not continue. If it does, then we may expect within 10 years, that prostitution will cease to be a crime. Solicitation, annoying advertising and the nuisance aspects of prostitution will remain, however, as they intrude on third-party rights. The same is likely to be true of gambling and drug possession offenses.

Criminal classification of abuses associated with larger commercial enterprise in these activities also will persist. Law enforcement will continue to do a brisk business in theft and violence surrounding

the money end of the commerce.

The forms of theft will change. Old-fashioned crimes such as burglary and robbery are a tough way to make a buck and may decline. The pay is poor, the risks high. The take in all the bank robberies in the United States doesn't equal the take from a couple of the larger embezzlements.

White Collar Crime Will Increase

White collar crime will increase, both because it is more profitable and because social needs are calling increasingly for criminal sanctions in the area of economic transaction. When a kid steals your hubcaps, that is theft. When the garage repairman puts a used generator in your car and charges you for a new one, that is a bad business practice.

It is these definitions which are changing.

Family Crime Will Increase

Family crime will increase or appear to increase as disputes previously settled within its walls or buried by custom are brought to the fore.

A rise in the reporting of assaultive behavior including rape and even property disputes in the family between spouses, on children, by children and in other equivalent social units will be accompanied by a decline in the number or seriousness of nonlethal assaults as society continues its trend to less physically oriented behavior. In the old days, a fight between people that knew each other didn't get to be a crime until one practically killed the other. That has changed.

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A Preliminary Report on Plea Bargaining

Longer Sentences with Ban

by Teresa J. White
Project Supervisor
Plea Bargaining Evaluation

A sharp increase in sentence lengths throughout Alaska during late 1975 and 1976 seems to be one result of the Attorney General's decision to ban plea bargaining.

The Alaska Judicial Council announced May 12 that preliminary analysis of data collected during a two-year evaluation of the Attorney General's policy showed that longer sentences were definitely given in the year following the policy change, and the increased punishments did not seem to be attributable to any other cause.

Sentences Up 50 to 300 Per Cent

The strongest influence of the policy was in drug felonies; an increase of 300% in sentence lengths for these crimes was found to be strongly associated with the change. Fraud and check crimes showed a 200% increase in sentence lengths and violent crime sentence lengths increased by 50%.

None of the other three felony classes showed changes in sentence length which could be associated with the policy. The analysis is still continuing. These findings should be considered preliminary until they can be subjected to sensitive statistical tests.

Longer Sentences Not A Goal — A Result

The Council's Executive Director, Michael L. Rubinstein, said that one of the Attorney General's major intents in instituting the policy was to "put sentencing back in the hands of the judges, where the Attorney General thinks it belongs." Lengthier sentences for convicted defendants was specifically disclaimed by the Attorney General as a policy goal, but it seems to have been one of its effects for certain types of crimes.

Sentences were examined using a variation on the technique of multiple regression analysis to take a preliminary look at the data. Charges against defendants were sorted into six classes of felonies, includ-

ing kidnapping and homicides, crimes involving sexual assault, violence or threats against a person, burglaries and larcenies, check and fraud, drugs, and "morals" crimes.

All of the variables previously determined to affect the length of sentence, such as prior criminal history, the specific offense of which the defendant was convicted, other associated charges, and "location" (i.e., whether the defendant was convicted in Anchorage, Fairbanks or Juneau) were held equal in the analysis. By employing this method, "the statisticians can be sure that in comparing any two sentences they are not looking at apples and oranges," Michael Rubinstein said.

Longer Misdemeanor Sentences

An earlier statistical study of misdemeanors published by the Judicial Council in May 1977 (Interim Report on the Elimination of Plea Bargaining) indicated an increase in misdemeanor sentences during the year following the elimination of plea bargaining.

The data used in this study did not lend themselves to the detailed methods of analysis applied to the felony data reported above, but did show that the average convicted misdemeanant could expect to receive a jail sentence of 12 days after the policy change rather than the average seven-day sentence imposed earlier. Net fines paid by misdemeanants also increased by 13.6%. A further, more detailed study of misdemeanors will be available in July of 1978.

Number of Trials Went Up

Other data released by the Judicial Council shed light on two widely held hypotheses about the effects of eliminating plea bargaining from a criminal justice system.

The first of these is that a ban on negotiated pleas would mean a crushing increase in the number of trials. An increase did occur in Anchorage, Fairbanks and Juneau, but it was less than anticipated.

One hundred nine felony charges were tried in these three cities during the year prior to the policy change (Year I); 149 charges went to trial during the year after (Year II). [Note that while the study attempted systematically to record over 200 discrete items of information about every felony arrest and court case during these two years for each of these cities, some small number of charges may be absent from the analysis, due to missing court files.]

The 50% increase in the trial rate is not evenly distributed among the three cities, however. Trials in Anchorage rose from 2.5% of all police charges to 5.2% in Year II, an increase of over 100%. However, in Fairbanks, 13.6% of all charges were tried in Year I; thus, the increase to 15.8% in Year II is a much smaller change. In Juneau, the trial rate actually dropped from 5.8% of all charges in Year I to 1.9% of all charges in Year II. It should be noted that there was no significant change in the absolute number of cases filed or felony arrests made in each of the two years.

Time Went Down

A second widely held hypothesis about plea bargaining is that an attempt to eliminate the practice would disrupt courts and cause administrative chaos. One means of testing this hypothesis is by analysis of the time required to dispose of a criminal charge in each year.

The Council's study showed that sharply contrary to most expectations, the courts actually became more efficient in their handling of criminal cases. During the first six months studied (August 1974-January 1975), the average criminal charge in Anchorage was in the courts for 192 days before its disposition. During the second six months of that study year, disposition time dropped to about 154 days, indicating increasing efficiency in the courts.

Despite a significant increase in trials in Anchorage, however, and the ban on plea bargaining, the drop continued, and by August of 1976, the disposition time for the average felony charge was only 89.5 days.

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Too Many Juveniles Detained?

According to a study commissioned by the Governor's Commission on the Administration of Justice, the pre-trial detention rate for juveniles in Fairbanks is at least eight times higher than nationally recommended standards.

Commission members were left wondering whether similar conditions are prevalent throughout the state.

The report, which was received by the Commission at its Petersburg meeting on April 26, from the Arthur D. Little Co., a national consulting firm, will be given more extensive consideration for action at a meeting scheduled for Fairbanks on July 19 and 20.

Figures collected by the study team headed by Ira Schwartz, executive director for the Washington State Council on Crime and Delinquency, show that in 1976 a total of 1,360 juvenile court referrals from the Alaska State Troopers, Fairbanks Police Department and other agencies. The records of the Fairbanks Police Department indicated that of the 723 referred by that department, 572 resulted in arrests and 470 of these were detained in the Fairbanks Correctional Center. Most detentions lasted from one to five days before the juveniles were released to their homes or other custodial placement. Comparable figures for 1977 indicated 517 arrests and 396 detained.

Acute Crowding

The high rate of detention results in acute crowding of Fairbanks facilities. The State Division of Corrections and others have used the overcrowding as justification for the proposed 76-bed juvenile correctional facility for the community which would include 28 beds for detention purposes.

Juvenile arrests in Fairbanks are related predominantly to petty offenses. Only 13 of the city's 517 arrests in 1977 involved crimes against a person. Including burglary as a crime against a person, still only 34 juveniles could be grouped in this category.

The great majority of offenses fell into such categories as shoplifting, joyriding and status offenses. Thus extensive pre-trial detention cannot be justified based on need to protect the public.

More Detentions Than Cases

The report also expressed concern that such a large number of arrests, evidently serious enough to warrant detention, was not reflected in subsequent court proceedings of any kind. The principal investigator said that in dozens of similar investigations around the country he had never before seen a situation where there were more detentions than cases docketed. The report also noted critically the absence of detention screening standards at the juvenile court level.

In 1977, 43 percent of Fairbanks Police Department arrests were detained. The National Council on Crime and Delinquency standard which earlier had recommended an average ratio not to exceed 10 percent of arrests has recently revised its standard, after reviewing the efficiency of alternatives to detention, to not more than five percent.

The basic reason suggested by the consultants for the excessive rate in Fairbanks is that the arrest and detention function is being used as a crisis intervention service. Experience in other jurisdictions suggests that utilization of a 24-hour crisis intervention function plus face-to-face screening would eliminate the need for secure detention for all but a handful of arrested juveniles.

The Need Seen for More Beds

The consultants reported that there was not in the foreseeable future a justification for more than six pretrial detention beds in Fairbanks if a more appropriate processing system was established.

Also proposed for use in Alaska is the practice of home detention, a procedure similar to "house arrest" used in many foreign countries, which is being adopted in a rapidly increasing number of American juvenile jurisdictions.

The consultants steered clear of any justification of their recommendation on a "juveniles should never be jailed" philosophy, pointing out that 24-hour crisis intervention had resulted in a very substantial cost saving in the communities that have moved in that direction.

The consultants said that the high detention rate did not appear to be the result of police enthusiasm but rather the absence of alternatives. Police representatives interviewed in Fairbanks agreed that the detention rate was too high but pointed out that the police officer only has a brief period of time in which to make and carry out a decision on disposition of the arrested juvenile.

Recommendations contained in the report included the following:

1. The Juvenile Justice Advisory Committee of the Alaska Criminal Justice Planning Agency should help re-examine the existing policies and practices regarding the detention of juveniles in Fairbanks and help promote policies and practices to reduce the high rate of juvenile detention without increasing the risk to public safety and minimize the need for secure detention facilities.
2. The Juvenile Justice Advisory Committee should recommend that no new secure custody facilities for juveniles be constructed in Fairbanks until:
 - a. A 24-hour detention screening and crisis intervention service is provided;
 - b. A home detention program is implemented;
 - c. A volunteer shelter bed program and/or other forms of temporary out-of-home shelter care is provided.
3. The advisory committee should closely examine the need for long-term programs and services for juveniles in the Fairbanks area as a similar situation may exist there as there is for short-term care.
4. The advisory committee should work closely with the consultant firm that has been selected to develop a master plan for juvenile and adult corrections.
5. The advisory committee should initiate more in-depth studies of the policies and practices of the juvenile justice system in all areas of the state.

Fifth in a Series

Law on Confessions:

Voluntary

By Peter S. Ring

This is the fifth article in the series on the Law on Confessions. In this article we will discuss voluntary statements and the problems caused by multiple confessions by a defendant, or letting the "cat-out-of-the bag."

Voluntary Statements Are Admissible

We have already discussed volunteered statements and indicated that they are admissible under *Miranda*, because they aren't covered by the decision. On the other hand, the decision made plain the fact that statements must be voluntary to be admissible.

In short, nothing in the *Miranda* decision disturbed the prior holdings of the U. S. Supreme Court that coerced confessions were inadmissible. (See installment one of this analysis, Forum, Vol. 2, No. 1). The difference between the terms "volunteered" and "voluntary" as used in this analysis should be plain from the following illustrations.

A person walks in off the street to police headquarters and tells the officer on duty at the counter that he has just shot and killed his mistress because he found her in bed with another woman and the blow to his manhood was too much for him. That admission is "volunteered."

On the other hand, the lawyer dangling by his heels from the 10th floor who has been informed of all his rights, and has had them explained a hundred times does not make a "voluntary" confession when he decides that unless he talks the police will carry through on their threat to release him.

In the *Hampton v. State*, 569, P.2d 138 (Alaska 1977), the court was called upon to deal with the issue of whether his statements were voluntarily made to the police. Hampton testified that he had been drinking heavily prior to the shooting, had shot up with heroin and was suffering intense pain from a previous leg injury, all of which led to his being too intoxicated to make a voluntary waiver of his rights. After reviewing all the evidence in the case, the court concluded that the

state had met its heavy burden of demonstrating that the statements were voluntary.

In *Ladd v. State*, 568 P.2d 960 (Alaska 1977), the voluntariness of his statements was also an issue before the court. Ladd contended that his being held in solitary (there were indications of threats against his life) and the fact that he was on tranquilizers at the time he made his statements to the investigators rendered them involuntary. In addition, he also argued that one of his statements was made as the direct result of a promise made to him by an investigator not to prosecute his girl friend. In reviewing the totality of the circumstances in the case the court concluded that the statements had been voluntarily made to the officers.

Scharver v. State, 561 P.2d 300 (Alaska 1977), also involved an issue of voluntariness, although not at the supreme court level. The trial court had excluded a statement made by Scharver to an officer in the hospital shortly after Scharver had been operated on for the gunshot wound he received while fleeing from the scene of the crime. The Supreme Court noted that the trial court had apparently excluded the statement out of concern for Scharver's postoperative condition.

A somewhat different slant on voluntariness is presented in *Schade v. State*, 512 P.2d 907 (Alaska 1973). The appellant in that case alleged that his statements to the police were involuntary because of his mental illness. As the court noted in its decision, "[m]ental illness is not an invariable bar to the admissibility of a confession. It is only one of several factors which must be weighed in determining whether the confession was a product of a free will, was the product of an irrational mind, or one which was overborne by coercion." 512 P.2d at 916. Reviewing the totality of the circumstances, the court found that Schade's statements were voluntary. The fact that they were written, interestingly enough, was further indication of their voluntariness in the view of the court.

As was pointed out in the second installment of this analysis (see Vol. 2, No. 2 of the Forum) the issue of voluntariness is complex and may be resolved by a variety of factors. Readers are urged to reread page 6 of that issue of the Forum.

Multiple Confessions or How Do We Get the Cat Back Into the Bag?

No single area of the law relating to confessions has necessitated more attention by the Alaska Supreme Court than have the problems surrounding multiple statements from a suspect, some of which are found to be invalid.

The fullest exploration of this issue, and the most recent is to be found in the court's decision in *Hampton*, supra. In reaching its decision the court was not required to treat the problem of "taint" at any length, but chose to do so, anyway. The significance of that awaits further clarification by the court, but the language which the court chose to illustrate the problem is instructive.

Where successive confessions are obtained as part of a continuous process, courts have usually excluded all when the first confession is deemed to have been given involuntarily.¹³ In his concurring opinion in *Darwin v. Connecticut*, 391 U. S. 346, 88 S.Ct. 1488, 20 L.Ed.2d 830 (1968), Justice Harlan discussed the problem of multiple confessions. He said:

"A principal reason why a suspect might make a second or third confession is simply that, having already confessed once or twice, he might think he has little to lose by repetition. If a first confession is not shown to be voluntary, I do not think a later confession that is merely a direct product of the earlier one should be held to be voluntary. It would be neither conducive to good police work, nor fair to a suspect, to allow the erroneous impression that he has nothing to lose to play the major role in a defendant's decision to speak a second or third time.

Statements

"In consequence, when the prosecution seeks to use a confession uttered after an earlier one not found to be voluntary, it has, in my view, the burden of proving not only that the later confession was not itself the product of improper threats or promises or coercive conditions, but also that it was not directly produced by the existence of the earlier confession."¹⁴ We think Justice Harlan's approach sound. (569 P.2d at 145)

Footnote 14 read as follows:

Darwin v. Connecticut, 391 U. S. at 350-51, 88 S.Ct. at 1490, 20 L.Ed.2d at 634.

In *United States v. Bayer*, 331 U. S. 532, 540, 67 S.Ct. 1394, 1398, 91 L.Ed. 1554, 1860 (1947), the Supreme Court dealt with the admission of a confession obtained six months after a prior unconstitutional confession. The Court stated:

Of course, after an accused has once let the cat out of the bag by confession, no matter what the inducement, he is never thereafter free of the psychological and practical disadvantages of having confessed. He can never get the cat back in the bag. The secret is out for good. In such a sense, a later confession always may be looked upon as fruit of the first.

However, since the conditions under which the involuntary confession had been made had been removed and six months had passed, the Supreme Court held in *Bayer* that admission of the second was not improper. (569 P.2d at 145)

It should be understood that the "cat-out-of-the-bag" kind of situation discussed in *Hampton* must be distinguished from other situations. *Dulier v. State*, 511 P.2d 1058 (Alaska 1973), provides an example of such a situation. In *Dulier* the court was confronted with an initial statement which might or might not have been custodial (and thus requiring *Miranda*

warnings) but was inculpatory. Because of that fact, plus the lapse of time between the first and successive statements, the court found that the subsequent statements which had been admitted into evidence had not been caused by the initial statements. In a footnote the court explicitly stated that this was not a "cat-out-of-the-bag" case.

Martel v. State, 511 P.2d 1055 (Alaska 1973), decided the same day as *Dulier*, provides an example of another "cat-out-of-the-bag" case.

Martel had been interviewed on the day of the shooting by the police and again three days later. No warnings were given prior to the first interview, but they were prior to the second. On this second occasion *Martel* indicated that he did not wish to be interviewed because he did not feel well and this request was observed. Three days later *Martel* was interviewed for the third time and it was a statement which was obtained at this interview which was introduced at trial and which *Martel* alleged as error on appeal. The court found that there was no interrelation between the first two statements—which had been excluded because of *Martel's* physical condition at the time they were taken—and the third which the court found was voluntarily given and untainted. There was nothing in either of his first two statements, apparently, which the court found to have been sufficiently incriminating to have led *Martel* to conclude that it was fruitless to continue to profess ignorance of the allegations.

Finally, the "cat-out-of-the-bag" problem was addressed by the court in *Soolook v. State*, 447 P.2d 55 (Alaska 1968). The appellant, *Soolook*, in that case was alleging error in the trial court's decision to admit into evidence at his homicide trial two confessions which he had made to the state troopers. The investigation into the homicide began prior to the decision in *Miranda* while the trial came after the decision and this situation created some of the problems in the case.

In their first contact with the defendant the troopers had informed him of his right to remain silent, that whatever he said could be used against him, and of his

right to an attorney. The troopers also asked *Soolook* if he understood these rights and he said yes. *Soolook* then admitted he committed the homicide.

Soolook admitted the killing a second time to his father without any questioning by or prompting from the troopers. He was then taken to Nome. En route, in response to questioning, he told the officers where he had thrown the knife he had used in the killing and pointed out the area to them upon arrival in Nome.

At the office of the District Attorney *Soolook* was informed that he did not have to talk, that he had the right to remain silent, that he had the right to an attorney then or at any time during the interview and that if he could not afford an attorney one would be appointed for him. *Soolook* responded affirmatively to a question on whether he understood the meaning of these rights.

After a short interval of time, he said, "Oh, well, I might as well tell you about it now." After an interrogation by the troopers he confessed. The confession was transcribed and thereafter *Soolook* told the district attorney that he wished to go down to see the victim's parents and tell them that he was sorry that he had killed their daughter.

In reviewing the arguments on appeal, the court found that the warnings were sufficient. Those given by the troopers complied with the requirements of *Escobedo v. Illinois*, U. S. (1964) which the court found were applicable at the time the troopers interrogated *Soolook* at his home. The warnings provided by the district attorney, the court found, were in compliance with the requirements of *Miranda*. Even if the warnings given by the troopers did not fully comply with the requirements of *Miranda*, the court found that the:

Bayer cat-out-of-the-bag rationale [would not require] the exclusion of appellant's confession to the district attorney. We have previously alluded to the fact that in *Bayer* the

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Future Trends in Criminal Justice in Alaska

(Continued from Page 1)

The popularity of handguns will continue. Contrary to the belief of some, convenience guns do kill people. A high homicide rate will continue to be the price we pay for the right to bear arms.

Police Organization Will Change

The movement towards greater technological complexity and specialization in our society will be reflected in the organization of police services. The police will be better educated and better organized with greater task differentiation among them. By the end of the decade, much of Alaska will be policed by regionally based forces responsible to borough authority.

The State public safety function will provide more by way of information, records and communications services on a broad front, and less in direct police services.

But some direct police activities will increase, notably in response to forms of crime organized on a statewide or interstate basis.

Most vehicles will be equipped with special CB transmission capability allowing an instant call for police assistance.

This police assistance will come in highly specialized forms depending upon the nature of the problem, from the air, on the ground, or by electronically automated response. Response may come from an alcohol control mobile unit, a neighborhood disputes constable or one of the new legion of federal land protection officers established to police federal parks and reservations—so greatly augmented by status classifications made under the "(d)(2)" provisions of the Alaska Native Claims Settlement Act.

The decade will see more relaxation of military models of policing as individual officers receive differentiated education and training, demand more participation in decision-making and look for a more average, middle-class life style.

Private Security to Grow

Private security will see major growth, much more than the public sector, as large corporations move to protect pipeline and processing facilities; and, in the case of Settlement Act corporations, land interests.

Increased internal security operations also will be required to investigate employee wrongdoing. The distinction between "policing" and "auditing" functions will blur in grey areas.

Alternatives to Courts

The trend to increased use of law and legal procedures to define human relationships shows no sign of letting up. "Grievance procedures" as in public and private employment situations will spread to cover a wide spectrum of disputes whether heretofore considered civil or criminal, including schools, student-teacher, and student-student relationships, neighborhood matters and government-citizen relationships.

In some respects this may include the formation of informal "courts" or arbitration forums associated with and supervised by the judicial system, but in general, the role and importance of the traditional judicial system will decline.

Current interest in "pre-trial diversion" programs, to move the accused offender or "difficulty causing" person out of the justice system or steer him away from it and to more responsive social mechanisms will increase.

Correctional Specialization

By no means will this be the end of holding institutions. But there will be an increase in their variety as specialization occurs to meet the specialties of human personality and offense. These institutions will have different needs for security and different community images and require different community involvement.

It is unlikely that any traditional, maximum security institution will be built in the state within the decade or longer. Increases in offender population will be met by more differentiated screening, making sure that the existing hard core capacity, now overused, is reserved for the most dangerous persons. Those who end up in this category will find themselves subject to more intensive "behavior modification" and personality changing techniques as the decade closes.

The justice system, old or new, will pay much more attention to victim compensation. The social costs of crime will receive greater attention as the social obligations of government. State-sponsored, comprehensive insurance will provide for quick restitution for stolen property or personal injury regardless of whether the offender is caught or whether he has the means to contribute to the loss he has caused.

More Women Criminals

While the use of the term "he" will continue, we can expect a rapid increase in the proportion of female offenders as social roles and opportunities are equalized for women. The enhanced role of women as criminals will be a contributing factor in encouraging the public to look at differentiated styles of incarceration, but sexual segregation itself will decline.

Co-ed treatment institutions will become the norm.

Privacy

Despite increased technological capacity for intrusion, there are few reasons to suppose that the criminal justice system will snoop more in our lives. Every indication is that the sense of personal rights and privacy is very much alive in Alaska and this sense will find ways to frustrate the march of technology, at least in the area of criminal justice administration.

Timing of Change Difficult to Predict

But technology is one of the wild cards in predicting the future of the justice system in Alaska. Some of the predictions made here could occur next year, some may not occur for 20 years, or even ever. Change is easiest to predict, the direction of change the next easiest, but predicting the timing of change is very difficult indeed.

There are horizons of recognition and realization in the ordering of our affairs. Frequently these horizons are defined by unforeseen changes in technology and economic circumstance.

For instance, if the energy crisis means greatly increased costs of fuel, government incentives for new production, new technologies for power production and rationing or special allocations of scarce resources, then a whole range of new or increased offenses will arise and man will invent strategies to cope, usually well after the fact.

Increased gas prices make gas more worth stealing, or fighting over. Allocation systems invite forgery, kickbacks (usually polite), extortion and similar offenses. Inventive ideas and knowledge become valuable and are stolen.

Where mass transit replaces the private auto, highway deaths and accidents and the need for traditional highway police will decrease.

At the same time, mass answers create the opportunity for massive disasters. The jet creates the opportunity for jet hijacking. Big dollar aggregations invite big dollar misappropriation. Big tankers and big pipe result in mind-boggling spills which may be caused recklessly or even intentionally.

What we do with the justice system in response to change is limited by our unchanging sense of the quantitative division between normalcy and deviancy. The content of crime changes according to other influences in society but we can only categorize a certain proportion of behavior, overall, as criminal.

After all, if everybody does it or likes it, how can it be deviant? So we can posit that, despite variations in reporting levels and public outcry, on the whole the level of criminal behavior will remain roughly constant.

The Nature of Change

Change will occur not in crime levels but in its content and the way we administer it. On the whole, there is reason for some optimism here. If only because the administration of justice is the most backward of the social sciences, we can expect greater speed in catching up.

The counterpart of the vexatious legalization of our society is that it substitutes for some of the sting of violence in us.

Though there is far to go, we are, per force, increasingly tolerant of differences among us which do not impinge on the

personal freedom of the beholder. We are more differentiating when we do respond.

Alaska Remains the Frontier

Alaska remains the frontier of the mood of America as well as geography. While technological sophistication will trickle down to us from the large population centers of the United States and the

world, we are likely to be in the forefront in social inventiveness in responding to our problems, including crime.

So, regardless of the headlines in next week's newspapers heralding some ghastly assault, Alaska is still likely to be a better place to live, from the perspective of justice administration, than most places and it will likely get better, not worse.

—A Book Review

Commissioner

Commissioner: A View from the Top of American Law Enforcement

by Patrick V. Murphy
and Thomas Plate
(Simon & Schuster, 1977)

It is difficult to sit down and write an objective review on a book written by a man for whom one has worked which is about a police department to which one dedicated five years of one's life. Nonetheless, I shall try to fairly treat Pat Murphy's somewhat retrospective analysis of the problems of policing.

This is a book which is essentially about the failures of police management. Murphy rightfully classifies existing policing as a "boss's job" and bemoans the fact that it has become so. As he cogently points out in his closing sentence:

Policing should not be a boss's job but rather a cop's job, because it is my view that perhaps the American police officer in this last quarter of the twentieth century has the most important job around.

Murphy would like to see better management of our police service. He feels that the insularity and provincialism which has surrounded policing in this country is beginning to break down. Managers are becoming better educated—a goal Murphy strongly supports. He urges that more "outsiders" be brought into

departments as chiefs—and, as Indians: women, minorities, civilians.

The F.B.I. comes in for both praise and condemnation from Murphy. He views the Bureau as still the only completely "professional" law enforcement agency in the country. On the other hand, he strongly attacks former Director J. Edgar Hoover, especially for the extent to which he interfered in local policing matters to insure his continued dominance as the preeminent law enforcement official in this country.

Issues of patrol force allocation and use, detectives and their role in policing, personnel reforms, corruption, city politics: all are treated in a thoroughgoing fashion by Murphy. The reader gets flashbacks from New York City, Syracuse, Detroit and Washington, D. C., as well as a look into other American communities. Throughout, we get insights into Murphy's personality and his career. The cool, unflappable administrator is revealed as a man of considerable warmth and understanding.

On a personal note, the book finally reveals why some absolutely brilliant ideas on detectives, motorcycles and mounted police never went anywhere.

For the police executive, the police officer, the student or the average citizen, COMMISSIONER will provide both entertaining and educational reading matter.

—Peter Ring

Opinions of Note

Charles R. White
v.
State of Alaska

Opinion No. 1605

Appeal from the Superior Court, Third Judicial District, Anchorage, Judge C. J. Occhipinti.

The Alaska Supreme Court affirmed the conviction of Charles R. White on two counts of assault with a dangerous weapon.

White argued on appeal that:

- The assault with a dangerous weapon statute, AS 11.15.220, as it was written at the time of the offense, violated equal protection by permitting different punishments or different degrees of punishment for the same act by persons in like situations.

- He was denied due process from the state's failure to preserve and produce lamp at the scene of the crime bearing his fingerprints.

- His right to confrontation and cross-examination was violated by the superior court's refusal to introduce hospital records of prior statements of one of the alleged victims.

The Alaska Supreme Court held:

1. Its prior opinion in *Larson v. State*, 569 P.2d 783 (Alaska 1977) was dispositive in upholding the constitutionality of the former assault with a dangerous weapon statute as there is no constitutional impediment to the legislature allowing a court to impose a lesser punishment for felonies than a one-year prison term. In this case the statute allowed imprisonment for less than a year, although White was sentenced to two concurrent five-year terms with three years suspended for probation.

2. The supreme court said there was no hint or suggestion of bad faith in the state's failure to preserve the lamp and White was not precluded from arguing his account of the presence of his fingerprints on the lamp. It was acknowledged at trial that the position of his fingerprints was consistent with White's explanation that he had touched the lamp several times prior to the alleged assault.

White neither requested the item nor indicated the importance of the evidence prior to trial and under the circum-

stances, the supreme court said, the resulting deprivation did not rise to the level of a violation of due process or of Criminal Rule 16(b)(7).

But, in footnotes, the supreme court said it would have been better police practice to maintain custody of the lamp and to make a record of the fingerprint's location. At a minimum, the court said, photographs of the object and the prints would supply the necessary data for the defense in cases like this. (In this particular case a raised design on the lamp prevented photography.)

The supreme court also noted that cases may arise in the future in which evidence is destroyed in good faith but which is so critical to the defendant's case that a due process violation would result. Accordingly, the supreme court said, its holding in this case does not foreclose the claim of due process violations in appropriate circumstances.

3. The supreme court said White's offer of proof supporting the admission of the hospital records was inadequate and if there was error in the exclusion of the records, it was harmless error.

The supreme court said White had successfully established that the victim's emotional condition was unstable prior to the shooting, including absentmindedness and possible brain damage as the result of a prior suicide attempt. The records would only have been cumulative in showing impaired capacity. In addition, the specific statement sought to be introduced was specifically corroborated by another witness.

Charles Allen Johnson
v.
State of Alaska

Opinion No. 1612

Appeal from the Superior Court, Third Judicial District, Anchorage, Judge Peter J. Kalamarides.

The Alaska Supreme Court reversed the conviction of Charles Allen Johnson for sale of narcotics because of the failure of the trial judge to follow the dictates of Rule 31(f) of the Alaska Rules of Criminal Procedure which prohibits the use of a sealed verdict over the defendant's objection.

The supreme court said it had no way of knowing if the defendant's rights were prejudiced by the trial court's disregard for the mandate of Rule 31(f). The language of the rule is clear and unambiguous, and leaves no room for judicial construction. This was not an inadvertent mistake by the trial court. It was a deliberate refusal to follow a promulgated rule.

If the rule is to have any vitality, it must be obeyed under the circumstances of this case.

Justice Warren Matthews dissented questioning whether the remedy of reversal was necessary to accomplish compliance with the Criminal Rule 31. He said that if the court is persuaded that the trial judge intentionally voided the rule it would be appropriate to refer the matter to the Judicial Qualifications Commission for appropriate action.

John C. Rivett
v.
State of Alaska

Opinion No. 1611

Appeal from the Superior Court, Fourth Judicial District, Fairbanks, Judge Gerald J. Van Hoomissen.

With contradictory evidence presented at trial regarding the use of metal knuckles, the Alaska Supreme Court reversed the conviction of John C. Rivett for assault with a dangerous weapon because the trial court did not instruct the jury on the lesser-included offense of assault and battery.

The supreme court said one cannot assault another with a dangerous weapon such as metal knuckles without also committing the lesser form of assault. It follows, therefore, that the offense of simple assault or assault and battery was necessarily included in the greater offense of assault with a dangerous weapon charged in this case. Since the evidence at trial raised an issue as to whether the defendant used a dangerous weapon in committing the alleged assault, under the ordinary rule he would be entitled to an instruction on both assault with a dangerous weapon and the lesser-included offense of assault and battery.

The matter was remanded back to the superior court for a new trial.

**Brief digests of Alaska Supreme Court Opinions
and the criminal justice issues involved**

Eddie Robert Griffith

v.

State of Alaska

Opinion No. 1613

Appeal from the Superior Court, Third Judicial District, Anchorage, Judge Victor D. Carlson.

In affirming the conviction of Eddie Robert Griffith for attempted robbery, the Alaska Supreme Court upheld the admission of a knit cap as evidence which was seized with a search warrant issued following a warrantless search of Griffith's personal effects by jail custodians three months after his arrest.

The supreme court also upheld the five-year sentence imposed on Griffith by the trial court.

The knit cap was allegedly worn by Griffith at the time of an attempted robbery of a 62-year-old man in an Anchorage bar and was worn by him at the time of his arrest. Its importance as evidence was not realized until the trial. The investigating officer then called the jail and the cap was located. Over defense objections a search warrant was issued to seize the cap with probable cause based on the earlier testimony of the victim that his assailant wore a brown knit cap, and the testimony of the investigator that Griffith was wearing such a cap at the time of his arrest.

Citing U. S. Circuit Court decisions upholding warrantless searches of stored property which yield evidence that had already been seen at the original inventory, the supreme court said no invasion of privacy occurred in this case. The arresting officer saw the cap at the time of Griffith's arrest and the later telephone call merely verified the continued availability of that which had been available and in plain view at the time of the arrest.

As an alternative ground for seizing the cap, the supreme court said the warrant was proper as it was based on the testimony of the victim and the arresting officer that Griffith was wearing the hat at the time of the offense and when arrested. This combined with the fact that Griffith had been in continuous custody since his arrest supplied the court with probable cause even without the telephone call to confirm the continued presence of the hat.

The supreme court also affirmed the five-year sentence imposed by the trial court judge. Although the judge did not have a psychiatric evaluation at the time of sentencing as required by the supreme court when sentencing youthful offenders, the judge ordered a psychiatric report and scheduled a sentence review hearing. The report, when completed, provided no basis for amending the sentence.

The supreme court also said the five-year sentence for attempted robbery was not excessive under the guidelines set down by the supreme court in *State v. Chaney*, 477 P.2d 441, 443 (Alaska 1970). In this case a 62-year-old man was "roughed up," threatened with a knife, and the only reason the robbery was not completed was solely because the victim struggled.

Gordon Pascu

v.

State of Alaska

Opinion No. 1614

Appeal from the Superior Court, Fourth Judicial District, Fairbanks, Supreme Court Justice Jay A. Rabinowitz sitting as a superior court judge and Superior Court Judge J. Justin Ripley.

Holding that the defendant had presented sufficient evidence to support a defense of entrapment, the supreme court reversed the conviction of Gordon Pascu for sale of heroin and remanded the case back to the superior court for rehearing on the entrapment issue.

The state will have the opportunity to present its evidence on the issue which was not heard at the original hearing.

The only evidence on the issue presented on the issue in the original hearing was Pascu's testimony that he was induced into the sale by the persistent pleas of a police agent presuming on alleged needs and past friendship in spite of Pascu's claims he was trying to "clean up" and get away from heroin. This was ruled insufficient as a defense without further evidence being taken and Pascu was subsequently indicted and convicted.

But the supreme court said the evidence presented was sufficient to establish a defense of entrapment and Justice Rabinowitz erred in ruling to the contrary. The court said such evidence, viewed objectively, shows a degree of inducement

going beyond the limits of permissible police conduct described in *Grossman v. State*, 457 P.2d 226, 227 (Alaska 1969).

The supreme court said it is firmly convinced that law enforcement officials can, and often must, employ deceptive measures in order to detect and apprehend those engaged in criminal conduct; thus it is quite proper to provide the opportunity for a criminal to ply his trade. But, officials cannot "implant in the mind of an innocent person the disposition to commit an offense and induce its commission in order that they may prosecute."

Gregory Joe Warmbo

v.

State of Alaska

Opinion No. 1615

Appeal from the Superior Court, Third Judicial District, Anchorage, Superior Court Judge Victor D. Carlson.

The supreme court upheld the extradition of Gregory Joe Warmbo from Washington to Alaska following an indictment for passing a forged check.

Warmbo sought a writ of habeas corpus in superior court claiming the extradition proceedings against him in Washington did not follow Washington law and he was denied due process.

He claimed he should have been allowed a hearing before the governor of Washington before a governor's warrant was issued for his arrest and that he was transported to Alaska before court proceedings in Washington were completed.

The supreme court said that while he may have been returned to Alaska through misunderstanding or bureaucratic error before his claims could be determined under Washington law, Warmbo was not deprived of a significant legal right requiring his return to that state. The supreme court said there is nothing in the statutes or case law of Washington giving a fugitive a legal right to a hearing before a representative of the governor.

Law on Confessions

(Continued from Page 5)

Supreme Court did state that once the secret is out an accused can never return the cat to the bag, and that, "In such a sense, a later confession always may be looked upon as fruit of the first." Additionally, the Supreme Court went on to state that:

[T]his Court has never gone so far as to hold that making a confession under circumstances which preclude its use, perpetually disables the confessor from making a usable one after those conditions have been removed.

Plea Bargaining

(Continued from Page 2)

It is interesting that the data reflected a trend toward greater efficiency preceding the implementation of the new policy. Thus, while the policy did not cause the speed-up; it did not impede it either. (It should be pointed out here that the Council's study was limited to criminal cases only. Effects on the civil docket, if any, were not measured).

Similar patterns were seen in Fairbanks and Juneau, though neither city showed changes as large as those found in Anchorage. Disposition times for Fairbanks cases started at 165 days, and dropped over the two years to 120 days. In Juneau, disposition times in August 1974 were well below those in the other cities—105 days—and dropped during the two years to 85 days.

Completion of the Judicial Council's data analysis is scheduled for late July 1978. The Council's final report on the Attorney General's policy will be published in the fall of 1978.

"While statistical analysis can give indirect indications of the policy's effects, it can't really tell you why something is happening," said Mr. Rubinstein. However, it certainly appears from the preliminary results that substantial changes have occurred in the criminal justice system following the ban on plea bargaining.

Assuming that the officer's failure to give appellant the full *Miranda* warning in the bedroom in Teller precluded the use of appellant's admission that he had committed the slaying, we believe the facts here present a situation in which appellant was not disabled from making a usable confession once the omission of the right to the presence of court-appointed counsel portion of the *Miranda*

CONFIDENTIALITY AND THE DRUG/ALCOHOL ABUSER

A seminar on the confidentiality of client information and the criminal justice system will be held Saturday, July 15, at 9 a.m., in the Boney Memorial Court Building in Anchorage.

The seminar is for law enforcement officers, prosecutors, defenders, court personnel, corrections officers and drug and alcohol treatment personnel. It will be conducted by representatives of Project Connection of the National Institute of Drug Abuse to improve interaction between the criminal justice agencies and drug and alcohol treatment programs.

This seminar will cover federal, state and local regulations, policies and procedures regarding the confidentiality of client information and identify what information treatment personnel can share with criminal justice agencies.

A preseminar planning meeting for those with specific questions they would like answered at the seminar will be held from 1-4 p.m., July 14, in the fifth-floor conference room of the Municipal Department of Health and Environmental Protection Office, 825 L St., Anchorage.

Further information or registration can be made by contacting:

Treatment Alternatives to Street Crime
825 L Street
Anchorage, Alaska 99501
Tel. 264-4811

Sponsors of the seminar include: Criminal Justice Center, Alaska State Office of Alcohol and Drug Abuse, Anchorage Municipal Office of Drug Abuse Services, and TASC.

warning had been rectified. In our view the cat-out-of-the-bag rationale is too tenuous and speculative a basis upon which to establish a tainted or poisoned fruit nexus between that of appellant's initial confession and the one he made to the district attorney in Nome. (447 P.2d at 63, footnotes omitted)

Before concluding this discussion of problems related to multiple interrogations and multiple admissions it would be well to reiterate a point made earlier in discussing the holding in *Ladd*. One of the points *Ladd* made on his appeal was that once he had indicated to the police that he did not wish to speak with them until he had obtained the services of and consulted with an attorney, any statements made thereafter in the absence of representation by an attorney should be inadmissible. The court rejected this line of argument as being overly broad, an opted, instead for a case-by-case approach to the problem. The same type of issue was raised and left unresolved by the court in *Scharver*, although one might argue that since *Ladd* followed *Scharver*, the holding therein answers one of the unanswered questions of *Scharver*.

The concluding installment of this analysis of the law related to confessions will deal with issues related to the collateral use of illegally obtained statements.

CORRECTION

In the April 1978 issue of ALASKA JUSTICE FORUM (Vol. 2, No. 4) the lead article: "A Fresh Look at Zehrunge" by Peter S. Ring contained an inaccuracy. The author stated on page 1, "The court made clear the fact that its decision in *McCoy* was based on an interpretation of the requirements of the Alaska Constitution."

Such was not the case. The court specifically indicated that they did not have to reach the issue of what the Alaska Constitution required, although they noted that Alaska was not bound by the requirements of the Federal Constitution.

The author regrets this error.

Justice Training Calendar

POLICE

- July 10-13. Police Physical Fitness Trainer's Course. Institute for Aerobics Research. Dallas, Tex.
- July 10-21. Criminal Redistribution (Fencing) Systems Investigation. Institution on Organized Crime. Miami, Fla.
- July 24-28. Police Corruption Issues. IACP. Detroit, Mich.
- July 25-27. Training Workshop. National Institute of Law Enforcement and Criminal Justice. Cincinnati, Ohio.
- Aug. 7-10. Police Discipline. IACP. Denver, Colo.
- Aug. 14-18. Protective Services: Meeting The Clandestine Threat. IACP. Vancouver, B. C., Canada.
- Aug. 14-18. Police Intelligence Management. IACP. Dallas, Tex.
- Aug. 14-18. Seminar on Homicide and Major Crime Scene Investigations. Traffic Institute of Northwestern University. Irving, Tex.
- Aug. 14-25. Federal Investigators' Advanced Seminar. National Institute of Professional Education for Investigators. Washington, D. C.
- Sept. 11-13. Weapon Selection—Body Armor, Weapons and Ammunition. IACP. Albany, N. Y.
- Sept. 11-14. Crime Analysis. IACP. Phoenix, Ariz.
- Sept. 11-15. Physical Fitness Programs for Police. IACP. San Francisco, Calif.
- Sept. 11-22. Law Enforcement Supervision. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 12-23. Evidence Gathering Course. Institute on Organized Crime. Miami, Fla.
- Sept. 13-Dec. 8. Basic Police Academy. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 17-23. The First Comprehensive Training Course on White Collar Crime Enforcement Strategies and Techniques. National Center on White Collar Crime. Seattle, Wash.

- Sept. 18-20. Police Fleet Management: Selection and Maintenance of the Police Vehicle and Auxiliary Equipment. IACP. Columbus, Ohio.
- Sept. 18-21. Police Labor Relations. IACP. Boston, Mass.
- Sept. 18-22. Management and Operation of Narcotic Units. IACP. Atlanta, Ga.
- Sept. 18-29. Narcotics Conspiracy Investigation. Institute on Organized Crime. Miami, Fla.
- Sept. 23, 30. Crowd Control and Use of Chemical Agents. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 25-Oct. 6. Criminal Investigation. Regional Criminal Justice Training Center. Modesto, Calif.

PROSECUTION

- July 9-28. Career Prosecutor Course. National College of District Attorneys. Houston, Tex.
- July 16-Aug. 4. Career Prosecutor Course. National College of District Attorneys. Houston, Tex.
- Sept. 17-21. Organized Crime. National College of District Attorneys. Pittsburgh, Pa.

JUDICIAL

- July 10-21. Trial Judges Academy. American Academy of Judicial Education. Boulder, Colo.
- July 10-21. Citizen Judges Academy. American Academy of Judicial Education. Boulder, Colo.
- July 16-28. New Trends—Graduate Course. National Judicial College. Reno, Nev.
- July 16-Aug. 11. General Jurisdiction. National Judicial College. Reno, Nev.
- July 23-26. The Courts and Adult Probation. Institute for Court Management. Snowmass, Colo.
- July 24-28. Trial Judges Writing Program, American Academy of Judicial Education. Boulder, Colo.
- July 30-Aug. 2. Annual Meeting of the Conference of Chief Justices and Conference of State Court Administrators Burlington, Vt.
- July 30-Aug. 11. Summer College. National College of Juvenile Justice. Reno, Nev.
- July 30-Aug. 11. Special Court Jurisdiction. National Judicial College. Reno, Nev.
- Aug. 7-18. Trial Judges Academy. American Academy of Judicial Education. Charlottesville, Va.

- Aug. 7-18. Citizen Judges Academy. American Academy of Judicial Education. Charlottesville, Va.
- Aug. 8-11. Developing Systems and Procedures in Misdemeanor Courts. Institute for Court Management. Snowmass, Colo.
- Aug. 13-16. Misdemeanor Court Management. Institute for Court Management. Keystone, Colo.
- Aug. 13-17. Fifth Annual Conference of National Conference of Appellate Court Clerks. National Center for State Courts. Mackinac Island, Mich.
- Aug. 13-25. Summer College. National College of Juvenile Justice. Reno, Nev.
- Aug. 21-23. Criminal Law I. American Academy of Judicial Education. Durham, N. H.
- Aug. 21-25. Specialty Academy. American Academy of Judicial Education. Stanford, Calif.
- Aug. 24-26. Evidence I. American Academy of Judicial Education. Durham, N. H.
- Sept. 17-22. Sentency Felons—Graduate Course National Judicial College. Reno, Nev.
- Sept. 17-Oct. 6. General Jurisdiction. National Judicial College. Reno, Nev.
- Sept. 24-28. Appellate Judges Seminar. Appellate Judges Conference. Boston, Mass.
- Sept. 24-29. Civil Litigation—graduate course. National Judicial College. Reno, Nev.

CORRECTIONS

- July 10-21. Basic Correctional Academy. Regional Criminal Justice Training Center. Modesto, Calif.
- July 24-28. Correctional Ancillary Program. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 11-22. Basic Correctional Academy. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 25-27. Crisis Intervention. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 25-29. Correctional Ancillary Program. Regional Criminal Justice Training Center. Modesto, Calif.

JUVENILE

- July 9-14. 41st Annual Conference of National Council of Juvenile and Family Court Judges. National College of Juvenile Justice. Hollywood, Fla.

- Aug. 7-10. Blue Ridge Institute. Southern Juvenile Court Judges Conference. Black Mountain, N. C.
- Aug. 28-31. The Police Role in Child Abuse and Neglect. IACP. San Diego, Calif.
- Sept. 10-15. Juvenile Justice Management—Advanced Seminar. Institute for Court Management. Snowmass, Colo.
- Sept. 17-22. Juvenile Justice Management. Advanced Seminar. Institute for Court Management. Snowmass, Colo.
- Sept. 18-22. Basic Juvenile Hall. Regional Criminal Justice Training Center. Modesto, Calif.
- Sept. 25-29. Police Juvenile Procedures. IACP. Norfolk, Va.

PRIVATE POLICE

- Sept. 30. Private Patrol Arrest Function. Regional Criminal Justice Training Center. Modesto, Calif.

MANAGEMENT

- July 9-14. Management for Supervisors. Institute for Court Management. Keystone, Colo.
- July 10-13. The Police Executive and the Law. IACP. Boston, Mass.
- July 16-19. Planning and Evaluating Jury Management Systems. Institute for Court Management. Keystone, Colo.
- July 22-Aug. 18. Phase II: Management in the Courts and the Justice Environment. Institute for Court Management. Keystone, Colo.
- July 28-29. State Court Statistics Seminar. National Center for State Courts. Burlington, Vt.
- July 31-Aug. 11. Recent Advances in Public Sector Operations—Research Program. Massachusetts Institute of Technology. Cambridge, Mass.
- Aug. 14-18. Tenth Annual Conference of the National Association of Court Administration. National Center for State Courts. Portland, Ore.

- Sept. 10-15. Personnel Administration. Institute for Court Management. Minneapolis, Minn.
- Sept. 24-27. Forecasting Judicial and Support Personnel. Institute for Court Management. San Francisco, Calif.

LEGAL

- Aug. 3-10. ABA Annual Meeting. New York, N. Y.

INTERNATIONAL

- July 16-Aug. 4. Comparative Criminal Justice Summer Program. California State University. Stockholm, Sweden.
- July 17-21. Responses to Hostage Taking Workshop. IACP. Ottawa, Canada.
- July 17-22. Tenth Congress of the International Association of Youth Magistrates. Montreal, Canada.

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Peter S. Ring

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