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# Romantic Relationships Matter for Girls' Criminal Trajectories:

## Recommendations for Juvenile Justice

Barbara A. Oudekerk & N. Dickon Reppucci

Ideally, contact with the juvenile justice system provides high-risk girls with an opportunity to receive intervention services, which will instigate their desistance from crime and promote competence in important adult developmental tasks, such as work, marriage, and parenting. Emerging research provides strong evidence that romantic relationships play an important and complex role in girls' criminal trajectories,<sup>1</sup> and interventions designed with a clear understanding of the associations between relationship outcomes, partner characteristics, and offending will be the most likely to reduce criminal activity and promote self-sufficiency in adulthood.

Indeed, involvement in delinquency and/or crime in adolescence is a consistent and robust predictor of negative outcomes—including victimization and violence—within girls' future romantic relationships.<sup>2</sup> This is not too surprising, given that most youth begin to form partnerships with only the training they have acquired through prior interpersonal relationships, and many girls who resort to crime possess long histories of conflict and aggression within the context of peer and family relationships.<sup>3</sup> In turn, poor-quality partnerships are known to have negative and long-term effects on girls' health, general functioning, and, of foremost importance to juvenile justice professionals, criminal trajectories.<sup>4</sup>

Until recently, romantic partners' effects on antisocial behavior received little attention, probably because the focus has largely been on male juvenile offenders, and male peers were assumed to have a stronger influence than romantic partners on boys' antisocial behavior.<sup>5</sup> However, relationships are

very important to girls' sense of self and well-being,<sup>6</sup> and existing research has demonstrated a consistent pattern of findings, which illustrate that romantic relationships play an important role in whether girls will offend in adolescence and adulthood. This article provides a summary of empirical research on the associations between romantic relationship characteristics and involvement in antisocial behavior. In addition, we present findings from the Gender and Aggression Project—Virginia Site<sup>7</sup> to illustrate the level of violence within romantic relationships among *incarcerated* girls, theoretically the most at-risk girls in the juvenile justice system.

### WHY SHOULD JUVENILE JUSTICE PROFESSIONALS BE CONCERNED ABOUT THE QUALITY OF ROMANTIC RELATIONSHIPS AMONG GIRLS WHO OFFEND IN ADOLESCENCE?

**Motive (1): Romantic partners can influence whether girls who offended in adolescence will recidivate or desist from crime in adulthood.** Adolescents who commit crimes are likely to form romantic relationships with partners who are involved in or who encourage antisocial behavior, a phenomenon referred to as "assortative mating."<sup>8</sup> Boys and girls with a history of antisocial behavior are equally likely to engage in assortative mating; this is important because involvement with an antisocial partner in adulthood is a significant risk factor for continued involvement in criminal behavior (i.e., recidivism) among young adult men and women,<sup>9</sup> even after accounting for friends' antisocial behaviors.<sup>10</sup> However, among women,

### Footnotes

1. TERRIE. E. MOFFITT ET AL., SEX DIFFERENCES IN ANTISOCIAL BEHAVIOUR: CONDUCT DISORDER, DELINQUENCY, AND VIOLENCE IN THE DUNEDIN LONGITUDINAL STUDY (Sidney Crown & Alan Lee eds., 2001).
2. Lynn Magdol et al., *Developmental Antecedents of Partner Abuse: A Prospective-Longitudinal Study*, 107 J. ABNORMAL PSYCHOL. 375 (1998); Johanne Vezina & Martine Hebert, *Risk Factors for Victimization in Romantic Relationships of Young Women: A Review of Empirical Studies and Implications for Prevention*, 8 TRAUMA, VIOLENCE, & ABUSE 33 (2007).
3. Candice L. Odgers & Marlene M. Moretti, *Aggressive and Antisocial Girls: Research Update and Challenges*, 1 INT'L J. FORENSIC MENTAL HEALTH 103 (2002).
4. MOFFITT ET AL., *supra* note 1; Diann M. Ackard et al., *Long-Term Impact of Adolescent Dating Violence on the Behavioral and Psychological Health of Male and Female Youth*, 151 J. PEDIATRICS 476 (2007); Victoria L. Banyard & Charlotte Cross, *Consequences of Teen Dating Violence: Understanding Intervening Variables in Ecological Context*, 14 VIOLENCE AGAINST WOMEN 998 (2008); Timothy A. Roberts et al., *Longitudinal Effect of Intimate Partner*

*Abuse on High-Risk Behavior Among Adolescents*, 157 ARCHIVES PEDIATRICS & ADOLESCENT MED. 875 (2003).

5. Dana L. Haynie et al., *Adolescent Romantic Relationships and Delinquency Involvement*, 43 CRIMINOLOGY 177 (2005).
6. Mark W. Baldwin et al., *Cued Activation of Relational Schemas: Self-Evaluation and Gender Effects*, 35 CAN. J. BEHAV. SCI. 153 (2003); Susan E. Cross & Laura Madson, *Models of the Self: Self-Concepts and Gender*, 122 PSYCHOL. BULL. 5 (1997); Odgers & Moretti, *supra* note 3, at 103.
7. Candice Odgers, Marlene M. Moretti & N. Dickon Reppucci, *A Review of Findings from the Gender and Aggression Project: Informing Juvenile Justice Policy and Practice through Gender Sensitive Research* (this issue).
8. MOFFITT ET AL., *supra* note 1; David Quinton et al., *Partners, Peers, and Pathways: Assortative Pairing and Continuities in Conduct Disorder*, 5 DEV. & PSYCHOPATHOLOGY 763 (1993).
9. MOFFITT ET AL., *supra* note 1.
10. Ronald L. Simons et al., *A Test of Life-Course Explanations for Stability and Change in Antisocial Behavior from Adolescence to Young Adulthood*, 40 CRIMINOLOGY 401 (2002).

dating *prosocial* or *non-criminal* partners in adulthood appears to be a protective factor against the risk for adulthood offending. That is, among girls who offended in adolescence, those who date antisocial partners in adulthood are at an increased risk for persisting in criminal activity whereas those who date prosocial partners are more likely to desist from a life of crime.<sup>11</sup> In contrast, men who offended in adolescence are more likely to offend in adulthood, even if they date prosocial partners in adulthood.<sup>12</sup> Thus, it seems that finding a “good” partner may be one of the factors that pull young women away from a life of crime.

**Motive (2): Negative experiences within early romantic relationships often precede delinquency.** Research consistently suggests that adolescent girls who become involved in “risky” partnerships are at increased odds for engaging in risk-taking behaviors, including drinking, illegal drug use, and other forms of delinquency.<sup>13</sup> Much of this evidence stems from analysis of survey data from the Longitudinal Study of Adolescent Health (Add Health) collected from a nationally representative sample of adolescent boys and girls ranging in age from 11 to 21 years old.<sup>14</sup> The first survey (“Wave 1”) was administered when adolescents were, on average, about 16 years old, and follow-up interviews (“Wave 2”) were conducted about one year later. Within Wave 1, researchers found girls who were in partnerships with “bad boys” were more likely to engage in offending behavior. That is, partners’ delinquency was significantly related to higher levels of involvement in minor and serious delinquency, even after controlling for peer delinquency, romantic relationship characteristics (e.g., duration of romantic relationship), and socio-demographic characteristics (e.g., family structure, parent education).<sup>15</sup>

Additional research conducted on the Add Health data set has revealed two relationship characteristics associated with initiation into delinquency. First, victimization within the context of romantic relationships was associated with increased nonviolent delinquency, including running away, destruction of property, and theft, among girls (but not boys).<sup>16</sup> Compared to non-abused girls, girls who experienced physical and/or emotional abuse within romantic relationships between Waves 1 and 2 also reported increased levels of nonviolent delin-

quency during this time. This association held even after controlling for socio-demographic characteristics (e.g., sex, age, ethnicity, family composition, parental education), relationship characteristics (e.g., abuse prior to the first interview, number of sexual partners between the first and second interview), and baseline reports of antisocial behavior, violence, substance use, suicidal behavior, and depression. However, receiving partner violence was not significantly related to increased *violent* offending, such as fighting and/or using a weapon.<sup>17</sup>

Next, much research has documented that adolescent girls who date older partners are at increased risk for negative sexual experiences,<sup>18</sup> and social scientists have stressed the importance of exploring the impact of partner age differences on other developmental outcomes in order to inform policymakers’ decisions around age of consent, statutory rape, and child abuse laws.<sup>19</sup> Analyses conducted with a subset of girls enrolled in Add Health provided evidence that dating older partners, defined as at least one year older, was a risk factor for involvement in general (i.e., nonviolent and/or violent) delinquency. After accounting for common causes of adolescent problem behaviors (e.g., poor attachments, risk-taking peers, poor psychological well-being), girls who began dating an older partner between Waves 1 and 2 reported significantly more involvement in delinquency in Wave 2 than girls who did not begin dating an older partner.<sup>20</sup>

Together, these findings demonstrate that negative experiences in early adolescent romantic relationships (i.e., experiencing violence, dating antisocial partners, and/or dating older partners) are important to girls’ initiation into crime and delinquency. Thus, many girls who come into contact with the juvenile justice system have already experienced negative and likely harmful relationships with romantic partners, which might place them at increased risk for failure in adulthood partnerships.

The research reviewed to this point has focused mainly on girls within school and other normative settings. To date, very few studies have examined the effects of partner characteristics among girls who are deeply involved in the juvenile justice system. In one study, Cauffman, Farruggia, and Goldweber<sup>21</sup> found that seriously offending girls (i.e., girls who had com-

11. MOFFITT ET AL., *supra* note 1; Quinton et al., *supra* note 8, at 763; Simons et al., *supra* note 10, at 401.

12. MOFFITT ET AL., *supra* note 1; Simons et al., *supra* note 10, at 401.

13. Elizabeth Cauffman et al., *Bad Boys or Poor Parents: Relations to Female Juvenile Delinquency*, 18 J. RES. ON ADOLESCENCE 699 (2008); Haynie et al., *supra* note 5, at 177; Amy M. Young & Hannah d’Arcy, *Older Boyfriends of Adolescent Girls: The Cause or a Sign of the Problem?* 36 J. ADOLESCENT HEALTH 410 (2005).

14. PETER S. BEARMAN ET AL., THE NATIONAL LONGITUDINAL STUDY OF ADOLESCENT HEALTH: STUDY DESIGN (1997), <http://www.cpc.unc.edu/projects/addhealth/design>.

15. Haynie et al., *supra* note 5, at 177.

16. Roberts et al., *supra* note 4, at 875.

17. *Id.*

18. Joyce Abma et al., *Young Women’s Degree of Control Over First Intercourse: An Exploratory Analysis*, 30 FAM. PLAN. PERSP. 12 (1998); Elm Begley et al., *Older Partners and STD Prevalence*

*among Pregnant African American Teens*, 30 SEXUALLY TRANSMITTED DISEASES 211 (2003); Jennifer Manlove et al., *Young Teenagers and Older Sexual Partners: Correlates and Consequences for Males and Females*, 38 PERSP. ON SEXUAL & REPROD. HEALTH 197 (2006); Barbara V. Marin et al., *Older Boyfriends and Girlfriends Increase Risk of Sexual Initiation in Young Adolescents*, 27 J. ADOLESCENT HEALTH 409 (2000).

19. Denise A. Hines & David Finkelhor, *Statutory Sex Crime Relationships between Juveniles and Adults: A Review of Social Scientific Research*, 12 AGGRESSION & VIOLENT BEHAV. 300 (2007); Harold Leitenberg & Heidi Saltzman, *College Women who had Sexual Intercourse When They Were Underage Minors (13–15): Age of Their Male Partners, Relation to Current Adjustment, and Statutory Rape Implications*, 15 SEXUAL ABUSE: J. RES. & TREATMENT 135 (2003).

20. Young & d’Arcy, *supra* note 13, at 410.

21. Cauffman et al., *supra* note 13.

mitted a felony offense) dated partners who were on average two to three years older than them, but these age differences did not seem to predict an increased rate of delinquency. Instead, the key factor related to girls' involvement in delinquent behavior was whether their partners encouraged their delinquency.

**Motive (3): Promoting healthy romantic relationships might reduce intergenerational transmission of risk for offending and violence.** Girls who are involved in delinquency are more likely than prosocial girls to date antisocial partners and experience conflict and violence within their romantic relationships.<sup>22</sup> Girls who commit crimes are also more likely to bear children in adolescence<sup>23</sup> and, unfortunately, are more likely to engage in violence against their children.<sup>24</sup> In turn, children born to high-risk, teenage mothers are at greater risk for unstable employment, academic failure, early childbearing, and, most importantly, violent offending.<sup>25</sup> Furthermore, research consistently demonstrates that children who witness parental violence (compared to those who do not) are more likely to become involved in violent romantic relationships when they grow older.<sup>26</sup> Therefore, interventions that promote the formation of healthy partnerships among women who offended in adolescence might decrease intergenerational transmission of partner violence and offending.

### WHAT IS THE QUALITY OF ROMANTIC RELATIONSHIPS AMONG INCARCERATED GIRLS?

Findings from the Gender and Aggression Project—Virginia Site<sup>27</sup> allowed us to construct profiles of the amount of violence and degree of partner age differences present in the romantic relationships of incarcerated girls (see Table 1 for a summary). In Wave 1, girls (mean age between 16 and 17 years) were asked to rate whether they had engaged in or experienced five physical abuse items within six months before incarceration: (1) pushed, grabbed, or shoved in an argument, (2) threw something toward, (3) slapped, (4) kicked, bit, or hit with a fist, and (5) hit with an object. Over half (56.1%) the girls had experienced at least one of these abusive acts within romantic relationships, and 14.4% had experienced all five types of physical abuse. Over two-thirds (68.2%) reported perpetrating one form of violence against their romantic partner, and 24.2% had perpetrated all five types of abuse against their partner. Overall, 72% of girls reported encountering violence, either as a victim or perpetrator, in their romantic relationships.

Furthermore, many girls were victims of statutory rape (i.e., carnal knowledge of a child/adolescent under Virginia law), meaning they reported dating *significantly* older romantic partners in early/mid-adolescent relationships. Participants were asked to report the largest age difference between them and one of their older romantic partners before incarceration. Only

**TABLE 1: RISKY ROMANTIC RELATIONSHIP CHARACTERISTICS AMONG INCARCERATED GIRLS**

RELATIONSHIP CHARACTERISTICS	%
<b>VICTIMIZATION BY ROMANTIC PARTNER</b>	
Pushed, grabbed, or shoved	45.5
Thrown something at	36.6
Slapped	37.1
Kicked, bit, or hit with a fist	32.8
Hit with an object	22.7
% Endorsed at least 1 form of violence	56.1
% Endorsed all 5 forms of violence	14.4
<b>VIOLENCE TOWARD ROMANTIC PARTNER</b>	
Pushed, grabbed, or shoved	56.5
Thrown something at	46.2
Slapped	50.0
Kicked, bit, or hit with a fist	41.7
Hit with an object	34.1
% Endorsed at least 1 form of violence	68.2
% Endorsed all 5 forms of violence	24.2
<b>OVERALL RELATIONSHIP VIOLENCE</b>	
Violence Toward or From Partner	72.0
<b>PARTNER AGE DIFFERENCES</b>	
1 - 3 years age difference	30.9
4 - 7 years age difference	35.5
8+ years age difference	33.6
Notes. These data were collected from 141 incarcerated girls who were enrolled in Wave 1 of the Gender and Aggression Project—Virginia Site.	

a subset ( $n = 81$ ) of girls completed these questions, but on average, they reported dating partners who were 6.87 years older than them. The median age difference was 5 years older, and partners ranged from 0 to 30 years older. One-third (33.6%) of the girls had dated a partner who was 8 or more years older than them. The prevalence of older partners in this incarcerated sample of girls is more extreme than in samples of non-incarcerated seriously offending girls,<sup>28</sup> suggesting that

22. MOFFITT ET AL., *supra* note 1.

23. *Id.*

24. Candice L. Odgers et al., *Female and Male Antisocial Trajectories: From Childhood Origins to Adult Outcomes*, 20 DEV. & PSYCHOPATHOLOGY 673 (2008).

25. Sara Jaffee et al., *Why Are Children Born to Teen Mothers at Risk for Adverse Outcomes in Young Adulthood? Results from a 20-Year*

*Longitudinal Study*, 13 DEV. & PSYCHOPATHOLOGY 377 (2001).

26. Miriam K. Ehrensaft et al., *Intergenerational Transmission of Partner Violence: A 20-Year Prospective Study*, 71 J. CONSULTING & CLINICAL PSYCHOL. 741 (2003).

27. Odgers, Moretti & Reppucci, *supra* note 3.

28. Cauffman et. al., *supra* note 13, at 699.

incarcerated girls may be experiencing some of the *riskiest* romantic relationship contexts.

**WHAT TYPES OF RELATIONSHIPS DO GIRLS BECOME INVOLVED IN AFTER LEAVING A JUVENILE CORRECTIONAL FACILITY?**

Table 2 summarizes risky relationship characteristics among girls who participated in Wave 2 of the Gender and Aggression Project and demonstrates two main findings. First, girls were still experiencing high rates of relationship violence in late adolescence (Wave 2; mean age about 19 years), after being released from the correctional center. Just under half (41.4%) the girls had experienced at least one form of physical victimization from their romantic partners, and 56.6% had perpetrated violence against their romantic partners. About 60% of girls encountered romantic relationship violence as a victim or perpetrator. Importantly, even when perpetration and victimization rates are equal within relationships, there is evidence that women victims are more likely than men victims to experience physical injury and diminished mental health and well-being.<sup>29</sup>

Second, and consistent with past research,<sup>30</sup> this sample of incarcerated girls were significantly likely to form romantic relationships with antisocial partners. A vast number of girls, 81.6%, dated a partner who engaged in at least one form of antisocial behavior, and 76.3% of girls' romantic partners had engaged in *violent* behavior. Importantly, it is difficult to determine whether girls choose "bad boys" as romantic partners or whether other factors (e.g., limited choice of potential partners) predispose or render youth vulnerable to involvement with antisocial partners.

Surprisingly, even though many girls reported dating antisocial boyfriends and experiencing violence and victimization within their relationships, 75% of girls felt strongly that their partners cared for and supported them.<sup>31</sup> More research is needed to better understand the nature of positive experiences within abusive romantic relationships. On one hand, girls who are satisfied with their partners might be less inclined to discuss their partners' abusive and antisocial behaviors with authorities and may be less willing to participate in relationship-focused interventions. Alternatively, if it is the case that these relationships contain genuine strengths, then it will be important to identify these types of "relationship assets," even among the highest-risk relationships, and leverage positive aspects of relationships to encourage desistance from crime.

**DO CHARACTERISTICS OF INCARCERATED GIRLS' ROMANTIC RELATIONSHIPS MATTER FOR DESISTANCE FROM CRIME?**

In Wave 2 of the Gender and Aggression Project, girls were asked to report if they had ever engaged in (a) 6 violent re-

**TABLE 2: RISKY ROMANTIC RELATIONSHIP CHARACTERISTICS FOR GIRLS AFTER RELEASE FROM INCARCERATION**

RELATIONSHIP CHARACTERISTICS	%
<b>RELATIONSHIP VIOLENCE</b>	
<b>VICTIMIZATION BY ROMANTIC PARTNER</b>	
Pushed, grabbed, or shoved	36.4
Kicked, bit, or hit with a fist	16.2
Hit with an object	12.1
% Endorsed at least 1 form of violence	41.4
% Endorsed all 3 forms of violence	7.1
<b>VIOLENCE TOWARD ROMANTIC PARTNER</b>	
Pushed, grabbed, or shoved	51.5
Kicked, bit, or hit with a fist	27.3
Hit with an object	23.2
% Endorsed at least 1 form of violence	56.6
% Endorsed all 3 forms of violence	19.2
<b>OVERALL RELATIONSHIP VIOLENCE</b>	
Violence Toward or From Partner	59.6
<b>PARTNERS' ANTISOCIAL BEHAVIOR</b>	
<b>NONVIOLENT BEHAVIOR</b>	
Purposefully destroyed or damaged property	38.1
Sold drugs	45.9
<b>VIOLENT BEHAVIOR</b>	
Carried a knife or a gun	43.3
Hit or threatened someone	64.6
Been in a physical fight	64.9
Been hurt in a physical fight	39.6
<b>% OF PARTNERS WHO ENGAGED IN:</b>	
at least 1 antisocial behavior	81.6
at least 1 nonviolent behavior	56.1
at least 1 violent behavior	76.3
Notes. These data were collected from 102 girls who participated in W-2 of the Gender and Aggression Project—Virginia Site.	

29. Barbara J. Morse, *Beyond the Conflict Tactics Scale: Assessing Gender Differences in Partner Violence*, 10 VIOLENCE & VICTIMS 251 (1995).

30. See, e.g., Simons et al., *supra* note 10, at 401.

31. In late adolescence, participants also completed a 10-item measure assessing their perceptions of validation and caring within

romantic relationships (Friendship Quality Questionnaire; Parker & Asher, 1993). Scores could potentially range between 1 and 5, with higher scores representing perceptions of more caring and validation in relationships, and 75% of girls received mean scores between 4 and 5.

offenses: carrying a knife or gun, robbery, using a weapon in a fight, fist fighting, attacking someone with the idea of seriously hurting or killing them, or shooting at someone, and (b) 6 nonviolent re-offenses: driving while drunk or high, selling pot, selling hard drugs, theft, stealing a vehicle, or prostitution. Only 30.4% reported involvement in nonviolent recidivism, but over half, 58.8%, reported that they engaged in at least one violent re-offense.

We tested whether risky relationship characteristics in Wave 1 (i.e., victimization by partner and violence toward partner in mid-adolescence)<sup>32</sup> and Wave 2 (i.e., victimization by partner, violence toward partner, partner's violent behavior, and partner's nonviolent delinquency in late adolescence) predicted self-reported violent and nonviolent offending in Wave 2.<sup>33</sup> Findings revealed that 71% of the girls who were being physically victimized by their partners in late adolescence reported engaging in delinquent offending during that same time. In contrast, only 22% of girls who did not experience partner violence engaged in nonviolent offending during late adolescence.

Early victimization experiences and partners' violent offending were strong predictors of girls' violent recidivism. Girls who experienced violence in mid-adolescence were 10.82 times more likely than girls who were not victimized to commit a violent offense in late adolescence. Furthermore, girls whose partners were engaging in violent offending in late adolescence were 5.32 times more likely to commit a violent re-offense, compared to girls with partners who were not involved in violent antisocial behavior. In sum, our data supports past research<sup>34</sup> and provides further evidence that girls who have negative experiences in early romantic relationships are at increased odds for continuing to engage in violent antisocial behavior as they mature.

#### **RECOMMENDATIONS FOR PROMOTING HEALTHY ROMANTIC RELATIONSHIPS AND ENCOURAGING DESISTANCE FROM CRIME AMONG ADOLESCENT GIRLS INVOLVED IN DELINQUENCY**

***Provide routine screenings upon entry into the juvenile justice system to assess the quality of girls' experiences in past romantic relationships and girls' risk for subsequent engagement in negative and harmful romantic relationships.*** Screenings will likely provide the most accurate assessments if they are conducted by professionals who recognize and understand adolescents' developmental competencies and limitations.

***Provide treatment and educational services that focus on forming healthy interpersonal relationships, specifically emphasizing healthy romantic relationships.***

***Connect juvenile-justice-involved youth to programs, organizations, and/or institutions (e.g., schools, stable employment, volunteer programs) wherein they will be likely to meet prosocial partners.***

#### **THE FINAL MESSAGE FOR JUVENILE JUSTICE PROFESSIONALS**

Although research on romantic relationships is just beginning to burgeon, the emerging findings consistently suggest that girls who engage in antisocial behavior are at risk for forming romantic relationships with antisocial partners, and even though many girls report satisfaction with their partners, the majority of these relationships are characterized by high rates of violence. In turn, girls who become involved in negative and harmful partnerships are more likely to continue offending, whereas girls who form relationships with prosocial partners are more likely to desist from crime. Thus, juvenile justice interventions that promote the formation of healthy romantic relationships may contribute to the reduction of recidivism and encourage positive outcomes in adulthood.



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32. Partner age differences were not examined because 22.5% of the data were missing.

33. Logistic regressions were conducted in SPSS. For predicting violent recidivism, model  $\chi^2 = 27.71$ ,  $p < .001$ , Nagelkerke  $R^2 = .35$ .

For predicting nonviolent recidivism, model  $\chi^2 = 7.623$ ,  $p = ns$ , Nagelkerke  $R^2 = .11$ .

34. See, e.g., MOFFIT ET AL., *supra* note 1.