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VIA ECOURTS

Re: State v. Bellamy, Docket No. A-0321-24

Honorable Judges:

Pursuant to Rule 2:6-2(b), kindly accept this letter brief on behalf of
Amicus Curiae MacArthur Justice Center.

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PRELIMINARY STATEMENT

Amicus Curiae, the Roderick & Solange MacArthur Justice Center (“MacArthur Justice Center”) submits this brief to aid the Court in enforcing a requirement of proportionate punishment under the New Jersey Constitution, which the trial court erroneously disregarded: the principle that young people “are constitutionally different” from adults. State v. Zuber, 227 N.J. 422, 444, (2017) (quoting Miller v. Alabama, 567 U.S. 460, 471 (2012)). Recognizing brain science on adolescent development, which now shows that young people continue to develop and mature well into their twenties, both the New Jersey Supreme Court and the Legislature have made clear that youth matters in sentencing—a principle the trial court gestured to, but in no way meaningfully abided by or implemented. As Amicus sets forth more fully below, Article I, Paragraph 12 of the New Jersey Constitution and the statutory requirement to consider a person’s age under 26 as a mitigating factor, N.J.S.A. 2C:44-1b(14), compel trial courts to meaningfully consider the mitigating qualities of youth. That requirement applies to late adolescents in accord with brain science and societal consensus demonstrating that young people continue to mature and develop well beyond the age of 18.

In a series of Eighth Amendment cases imposing categorical bars on capital and life without parole (“LWOP”) sentences for youth, the U.S. Supreme

Court recognized that young people’s immaturity diminishes their culpability, while their ongoing growth and neurological development render them remarkably capable of change. Miller v. Alabama, 567 U.S. at 477, enumerated factors rooted in adolescent brain development that describe these hallmark features of youth. The New Jersey Supreme Court later built upon Miller under the more expansive protection of the New Jersey Constitution’s prohibition on cruel punishment. Specifically, State v. Zuber, 227 N.J. at 429, 445, and State v. Comer, 249 N.J. 359, 402 (2022) endorsed the “Miller factors” as requirements for proportionate sentencing of young people. These constitutional principles compel trial courts to evaluate the mitigating qualities of youth when sentencing late adolescents, even though the holdings of Zuber and Comer addressed the legality of punishments applicable to people who committed crimes before age 18.

Moreover, the juvenile sentencing jurisprudence turned on features of adolescent development which data now show apply equally to young people well into their twenties. The data underscore what the Legislature has long recognized and continues to emphasize in recent laws: that even after 18, young people are immature, vulnerable to influence, often unable to control impetuous behavior and yet remarkably capable of change.

The trial court disregarded the constitutional requirement that youth matters in sentencing, as well as the undisputed scientific record developed upon remand. It sentenced Latonia Bellamy to an aggregate sentence of 64 years, ensuring she will not be eligible for parole until she is an octogenarian. The court erred by failing to meaningfully apply the Miller factors even though the crime occurred when Ms. Bellamy was a traumatized and vulnerable 19-year-old and notwithstanding her demonstrated growth, remorse, and extraordinary rehabilitation.

The trial court was not free to disregard the importance of youth in sentencing. That is clear as a matter of statutory law recognizing youth under age 26 as a mitigating factor. N.J.S.A. 2C:44-1b(14). It is clear from this Court's 2021 remand, which instructed the trial court to meaningfully consider matters central to Ms. Bellamy's diminished culpability as a 19-year-old. And most importantly, it is clear based upon precedent enforcing the requirement of proportionate punishment under Article 1, Paragraph 12 of the New Jersey Constitution. Because the trial court's sentence cannot be squared with this law and is out of step with scientific evidence and societal consensus demonstrating that 18 in no way reflects the decisive age of maturation, this Court must reverse and remand for a constitutional sentence.

STATEMENT OF INTEREST OF AMICUS CURIAE

Amicus MacArthur Justice Center is a public interest law firm founded in 1985 by the family of J. Roderick MacArthur to advocate for human rights and social justice through litigation. Amicus has offices in Chicago, at the University of Mississippi School of Law, in New Orleans, in St. Louis, and in Washington, D.C. In courts across the country, Amicus has litigated cases concerning state constitutional limits on sentencing and has challenged police misconduct, extreme sentencing—including for youth—and the mistreatment of incarcerated people. Amicus writes to demonstrate that the hallmark features of youth recognized in Miller and endorsed by the New Jersey Supreme Court in Zuber and Comer apply equally to young people well into their twenties. Drawing upon its expertise and national perspective, Amicus seeks to assist the Court in ensuring that the bedrock principles reflected in the last 15 years of youth sentencing jurisprudence are followed and respected in this case.

STATEMENT OF FACTS AND PROCEDURAL HISTORY

Amicus relies upon the Statement of Facts and Procedural History set forth in brief of the Office of the Public Defender with the following additions. On September 20, 2022, MacArthur Justice Center moved for leave to appear as Amicus Curiae before the trial court, which granted the motion. The Appellate

Division's Clerk's office, after confirming Amicus's intent to participate on appeal, directed counsel to file a brief by October 17, 2025.

ARGUMENT

I. ARTICLE I, PARAGRAPH 12 OF THE NEW JERSEY CONSTITUTION AND N.J.S.A 2C:44-1b(14) COMPEL COURTS TO MEANINGFULLY CONSIDER THE MITIGATING QUALITIES OF YOUTH WHEN SENTENCING LATE ADOLESCENTS.

Irrespective of the categorical rules on youth sentencing imposed by the U.S. Supreme Court or the New Jersey Supreme Court with respect to offenders under 18 years old, Article 1, Paragraph 12 of the New Jersey Constitution still required the trial court to meaningfully assess the hallmark features of youth in imposing a proportionate sentence upon Ms. Bellamy. Indeed, the Federal and State Constitutions bar punishments that are disproportionate to the crime committed and the characteristics of the offender. Graham v. Florida, 560 U.S. 48, 59 (2010); Miller, 567 U.S. at 469 (citing the “basic ‘precept of justice that punishment . . . should be graduated and proportioned’ to both the offender and the offense”) (quoting Roper v. Simmons, 543 U.S. 551, 560 (2005) (citation omitted)). The “[p]rotection against disproportionate punishment is the central substantive guarantee of the Eighth Amendment.” Montgomery v. Louisiana, 577 U.S. 190, 206 (2016), as revised (Jan. 27, 2016); Comer 249 N.J. at 383

(noting that test of cruel punishment under the State Constitution is generally the same as the Eighth Amendment).

When enforcing the proportionality requirement as applied to severe punishments for youth, the U.S. Supreme Court has repeatedly recognized that youth are “constitutionally different from adults for purposes of sentencing.” Miller, 567 U.S. at 471 (citing Graham, 560 U.S. at 68, and Roper, 543 U.S. at 551 (barring the death penalty for youth under 18)). That is, youth “are less deserving of the most severe punishments” because of their “diminished culpability and greater prospects for reform.” Id. (quoting Graham, 560 U.S. at 68).

The Court has long relied upon the science of juvenile brain development when explaining young people’s diminished culpability. See Miller, 567 U.S. at 471 (“Our decisions rested not only on common sense—on what ‘any parent knows’——but on science and social science as well.”); Roper, 543 U.S. at 570 (citing Steinberg & Scott, Less Guilty by Reason of Adolescence: Developmental Immaturity, Diminished Responsibility, and the Juvenile Death Penalty, 58 Am. Psychologist 1009, 1014 (2003)). Miller, for example, relied on studies cited in Graham and Roper, showing “‘fundamental differences between juvenile and adult[s]...in [the] ‘parts of the brain involved in behavior control.’” 576 U.S. at 471-72 (quoting Graham, 560 U.S. at 68). Based upon this evidence,

the Court cited three ways that young people are less culpable, and therefore less deserving of the most severe punishments as compared to adults.

First, the Court explained that adolescents' immaturity and "underdeveloped sense of responsibility," leads them to engage in behavior showing "recklessness, impulsivity, and heedless risk-taking." Miller, 567 U.S. at 471 (quoting Roper, 543 U.S. at 569); Id. at 472 n.5 (citing Brief for American Psychological Association et al. as Amici Curiae 3) ("It is increasingly clear that adolescent brains are not yet fully mature in regions and systems related to higher-order executive functions such as impulse control, planning ahead, and risk avoidance"). Prior to full maturation, young people are therefore susceptible to "transient rashness, proclivity for risk, and inability to assess consequences." Miller, 567 U.S. at 472; Graham, 560 U.S. at 68.

Second, the Court has emphasized that young people are less culpable than adults because they are "'more vulnerable ... to negative influences and outside pressures,' including from their family and peers[.]" Id. at 471 (quoting Roper, 543 U.S. at 569). Adolescents also have little power to resist these negative peer and family influences since they "have limited 'contro[l] over their own environment' and lack the ability to extricate themselves from horrific, crime-producing settings." Id. at 471 (quoting Roper, 543 U.S. at 569). The Court again cited brain science to support this conclusion. Id. at 472 n.5 (citing Brief for J.

Lawrence Aber et al. as Amici Curiae 26 (“Numerous studies post-Graham indicate that exposure to deviant peers leads to increased deviant behavior and is a consistent predictor of adolescent delinquency”). For this reason, “‘youth is more than a chronological fact.’” Id. at 476 (quoting Eddings v. Oklahoma, 455 U.S. 104, 115 (1982)). “It is a moment and ‘condition of life when a person may be most susceptible to influence and to psychological damage.’” Id.

Third, the Court recognized that young people are less culpable even when they make grievous mistakes because their “character is not as ‘well formed’ as an adult’s; his traits are ‘less fixed’[.]” Id. at 471 (quoting Roper, 543 U.S. at 570). This fact makes adolescents’ “actions less likely to be evidence of irretrievable depravity.” Id. (internal citation and quotation omitted). The differences and plasticity in the developing adolescent brain, Miller noted, increase the likelihood that “as the years go by and neurological development occurs, [their] ‘deficiencies will be reformed.’” Id. at 472 (quoting Graham, 560 U.S. at 68).

When interpreting the cruel and unusual punishment restrictions of Article I, Paragraph 12 of the New Jersey Constitution, the New Jersey Supreme Court has endorsed these fundamental precepts. See Zuber, 227 N.J. at 446-47; Comer, 249 N.J. at 368. But our State Supreme Court has also made clear that the New Jersey Constitution is a source of independent rights that extend beyond U.S.

Constitutional protections. Zuber, 227 N.J. at 438. Thus, in Zuber, the Court held that mandatory de facto life sentences for youth under age 18 violate the State Constitution even though the U.S. Supreme Court had not reached whether punishments other than LWOP were categorically disproportionate for children. 227 N.J. at 446-47 (finding that Miller's rationales "appl[y] with equal strength to a sentence that is the practical equivalent of life without parole") (citations omitted).

Five years later, in State v. Comer, the New Jersey Supreme Court again read the New Jersey Constitution as more protective of youth than the Federal Constitution holding that automatic, mandatory 30-year parole ineligibility for children violated the State Constitution's ban on cruel and unusual punishment. Comer, 249 N.J. at 401 (holding "that juveniles may petition the court to review their sentence after 20 years").

Although the New Jersey Supreme Court has gone further than the U.S. Supreme Court with respect to the reach of its juvenile sentencing decisions, it has adopted the factors discussed in Miller as the touchstone for implementing the constitutional requirement that courts consider the mitigating nature of youth in sentencing decisions. Zuber, 227 N.J. at 445 (citing Miller, 567 U.S. at 477-78); Comer, 249 N.J. at 370 (courts must "assess a series of factors . . . set forth

in Miller v. Alabama, which are designed to consider the ‘mitigating qualities of youth’”). Those factors include:

- (1) “‘chronological age and its hallmark features—among them, immaturity, impetuosity, and failure to appreciate risks and consequences’”;
- (2) “‘family and home environment that surrounds [the juvenile offender]—and from which he cannot usually extricate himself—no matter how brutal or dysfunctional’”;
- (3) “‘the circumstances of the homicide offense, including the extent of his participation in the conduct and the way familial and peer pressures may have affected him’”;
- (4) “‘that he might have been charged and convicted of a lesser offense if not for incompetencies associated with youth—for example, his inability to deal with police officers or prosecutors (including on a plea agreement) or his incapacity to assist his own attorneys’”; and
- (5) “‘the possibility of rehabilitation.’”

[Zuber, 227 N.J. at 445 (quoting Miller, 567 U.S. at 477-78); see also Comer, 249 N.J. at 403 (citing Miller, 567 U.S. at 477-78).]

In the years since the U.S. Supreme Court decisions that served as the foundation for the New Jersey Supreme Court’s more expansive approach in Zuber and Comer, the science on late adolescents over age 18 has shifted from developing findings to well-accepted evidence. It is now clear that neurological and psychological development do not halt on one’s 18th birthday. That brain

science, which is undisputed in this case, shows that the same mitigating factors cited in Miller, Zuber, and Comer persist past age 18.

Courts in other states have cited this brain science and recognized that young people’s continuing development after 18 must be accounted for in sentencing. See People v. Taylor, People v. Czarnecki Nos. 166428 and 166654, --- N.W.3d ----2025 WL 1085247,*7 (Apr. 10, 2025) (“Stated differently, as a class, 19- and 20-year-old late adolescents are more similar to juveniles in neurological terms than they are to older adults.”); In re Monschke, 197 Wash. 2d 305, 325-28 (2021) (reasoning that “no meaningful neurological bright line exists between . . . age 17 on the one hand, and ages 19 and 20 on the other hand” such that the mitigating qualities of youth outlined in Miller and related watershed cases matter when sentencing youth older than 18); Commonwealth v. Mattis, Commonwealth v. Robinson, 493 Mass. 216 (2024) (holding that LWOP sentences for late adolescents violate the state constitution because people 18, 19, and 20 are not substantially different from people younger than 18 with regard to their immaturity and still developing brains).

In 2020, the New Jersey Legislature recognized that very same brain science when it added N.J.S.A. 2C:44-1b(14) as a mitigating factor that courts must consider. L. 2020, c. 110. That law requires courts to consider as a mitigating circumstance that “[t]he defendant was under 26 years of age at the

time of the commission of the offense.” State v. Canfield, 470 N.J. Super. 234 (App. Div. 2022), aff’d as modified 252 N.J. 497 (2023) (quoting N.J.S.A. 2C:44-1b(14)). As this Court noted in reversing and remanding this matter to the trial Court in 2021, this law makes youth matter in sentencing for people up to age 26 in light of “‘developments in psychology and brain science’” showing that “the ‘parts of the brain involved in behavior control continue to mature through late adolescence.’” State v. Bellamy, 468 N.J. Super. 29, 46 n.3 (2021) (“Bellamy II”) (quoting Zuber, 227 N.J. at 441 (citation omitted)).

In sum, the rationales underlying the New Jersey Supreme Court’s interpretation of Article I, Paragraph 12 in cases involving youth under 18 apply equally to young people past that age who possess the same mitigating features of youth. See Zuber, 227 N.J. at 422; Comer, 249 N.J. at 383. Accordingly, the trial court was required as a constitutional matter and pursuant to N.J.S.A. 2C:44-1b(14) to apply the Miller factors when sentencing Ms. Bellamy. Although the court gave lip service to mitigating factor 14, it failed to actually assess the mitigating quality of Ms. Bellamy’s youth in imposing a lengthy 64-year consecutive sentence. That is, it failed to account for her “‘immaturity, impetuosity, and failure to appreciate risks and consequences’” at the age of 19; it failed to account for how her “‘brutal and dysfunctional’” “‘family and home environment’” impacted her crime and ability to extricate herself from negative

circumstances; it failed to consider the role of youth in “the circumstances of the homicide offense, including the extent of [her] participation in the conduct and the way familial and peer pressures may have affected” her; and finally it failed to account for the strong “possibility of rehabilitation” Ms. Bellamy possessed at the age of 19, which the record overwhelmingly demonstrates has now been realized. Zuber, 227 N.J. at 445 (quoting Miller, 567 U.S. at 477-78); see also Comer, 249 N.J. at 403 (citing Miller, 567 U.S. at 477-78). This Court must reverse with instructions to follow these statutory and constitutional requirements.

II. THE TRIAL COURT’S CONCLUSION THAT MS. BELLAMY “WAS STILL AN ADULT UNDER NEW JERSEY LAW” IS UNDERMINED BY THE NUMEROUS NEW JERSEY STATUTES THAT TREAT LATE ADOLESCENTS AGE 18 TO 21 THE SAME AS JUVENILES GIVEN THEIR IMMATURITY, IMPETUOUSNESS, AND LACK OF JUDGMENT.

In sentencing Ms. Bellamy to a 64-year sentence the trial court suggested that “defendant was still an adult under New Jersey law[.]” 27T171-8 to 172-5. Not only does that explanation fall far short of compliance with this Court’s remand and constitutional requirement to consider the Miller factors, as outlined above, it also is undermined by the numerous laws in New Jersey regulating young people as adolescents after the age of 18 and distinguishing them from adults. From youth sentencing laws to restrictions on drugs, alcohol, gambling, handguns, and tobacco, New Jersey, along with many other jurisdictions, has

long recognized that young people remain vulnerable and immature even past the age of 18.

Of course, the enactment of mitigating factor 14 reflects the Legislature’s considered judgment that young people over 18 are different from adults. State v. Rivera, 249 N.J. 285, 302 (2021) (citing S. Judiciary Comm. Statement to A. 4373 1 (L. 2020, c. 110) (noting that the change meant to “broaden the court’s consideration of age as a mitigating factor for determining sentences”). Additionally, the Persistent Offender Statute recognizes that youth over age 18 lack maturity and warrant special treatment. N.J.S.A. 2C:44-3(a). That law allows a person to be sentenced to “to an extended term of imprisonment” only if they are “21 years of age or over” and have committed three first-, second-, or third-degree qualifying crimes. N.J.S.A. 2C:44-3(a); see also State v. Pierce, 188 N.J. 155, 162 (2006) (age is a “prerequisite finding” to qualify “as a ‘persistent offender’”). This special solicitude for youth over the age of 18 in the area of criminal sentencing is consistent with both long-standing and emerging legislation treating youth age 18 to 21 the same as juveniles to protect them from legal activities that require maturity and judgment.

For example, the Legislature’s age-restrictions on alcohol reflect a longstanding understanding that people who reach the age of 18 but who are not yet 21 are not fully developed. See, e.g., N.J.S.A. 33:1-77; N.J.S.A. 9:17B-1(b).

New Jersey follows the Federal Uniform Drinking Age Act of 1984, 3 U.S.C. § 158, which incentivized states to set their legal drinking age at 21. South Dakota v. Dole, 483 U.S. 203 (1987). That law followed the report of a Presidential Commission that emphasized the unique characteristics and susceptibilities of youth. Id. at 209 (citing Presidential Commission on Drunk Driving 8, 11 (1983)¹ (noting that young people “are at greatest risk for involvement in motor vehicle crashes” because of the impetuous and volatile nature of youth)). All fifty states uniformly adhere to 21, not 18, as the legal and safe drinking age.²

While in the 1970s New Jersey extended basic civil and contractual rights and obligations to people 18 and older for certain purposes, N.J.S.A. 9:17B–1 to 9:17B–3, it has always simultaneously recognized, as demonstrated by policies like the drinking age, that with respect to activities that require maturity and judgment, young people under 21 are not fully developed.³ For example,

¹ <https://babel.hathitrust.org/cgi/pt?id=mdp.39015034427750&view=1up&seq=24>

² J.H. Hedlund, et al., Determine Why There Are Fewer Young Alcohol-Impaired Drivers, Nat’l Highway Traffic Safety Admin. (2001), available at <http://www.nhtsa.dot.gov/people/injury/research/FewerYoungDrivers/index.htm>, archived at <http://perma.cc/78X8-CGKB>.

³ The adoption of 18 as the age of majority even for limited purposes stemmed from states’ efforts to maintain consistency when the U.S. lowered the draft age during World War II. Vivian E. Hamilton, Adulthood in Law and Culture, 91 Tul. L. Rev. 55, 64-65 (2016). But there was still no “widely held consensus that young people reached maturity or generally attained adult-like capabilities” at 18. Id.

New Jersey has long placed higher age restrictions on gambling. See N.J.S.A. 9:17B-1 (limiting casino gaming to people legally able to purchase alcohol). And after New Jersey legalized sports betting in 2018, it restricted such activities to people “at least 21 years of age.” N.J.S.A. 5:12A-11(e).

Around the same time, New Jersey also raised the legal age for purchasing tobacco products and electronic smoking devices from 19 to 21. N.J.S.A. 2C:33-13.1; N.J.S.A. 2A:170-51.4. Research showed that the hallmark features of youth rendered young people particularly vulnerable to the dangers of smoking, even past age 18. Institute of Medicine of the National Academies, Ending the Tobacco Problem: A Blueprint for the Nation, 93 (2007) (young people “misperceive the magnitude of smoking harm . . . and fail to appreciate the long-term dangers” in light of their “general tendencies . . . to take a short-term perspective and to give[] substantial weight to peer influences”).⁴

New Jersey likewise prohibits people under 21 from purchasing or possessing handguns in recognition of younger people’s immaturity, impulsivity, and risk-taking. N.J.S.A. 2C:58-3c(4); N.J.S.A. 2C:58-6.1b. Federal restrictions in 18 U.S.C. § 922(b)(1) and (c)(1), which prohibit licensed firearms dealers from selling handguns to people under 21, reflect a similar

⁴ <http://www.iom.edu/Reports/2007/Ending-the-Tobacco-Problem-A-Blueprint-for-the-Nation.aspx>

rationale. See Federal Firearms Act: Hearings Before the Subcomm. to Investigate Juvenile Delinquency of the Sen. Comm. on the Judiciary, 90th Cong. 57 (1967) (testimony of Sheldon S. Cohen) (noting that the “easy availability of weapons” impacts young people’s “tendency toward wild, and sometimes irrational behavior”). Moreover, 14 states prohibit people under 21 from purchasing handguns, and 9 states make 21 the minimum age for handgun possession. Giffords Law Center to Prevent Gun Violence, Minimum Age to Purchase & Possess.⁵ As experts recognize, these laws accord with research showing “that the human brain continues to develop” in late adolescents “particularly in areas that may alter a person’s likelihood of involvement in violence against themselves or others.” Id.

Multiple other areas of New Jersey law similarly decline to confer responsibility upon youth under 21. For instance, the New Jersey Constitution limits eligibility for service in the state Legislature to adults older than 21. N.J. Const. art. IV, § 1, ¶ 2. And to be a senator the person must be thirty. Id. The State has also carved out exceptions to the notion that 18 is the age of majority. For example, people “between 18 and 21 years of age [may] seek to avail themselves of” services provided to dependent and neglected children. N.J.S.A.

⁵<https://giffords.org/lawcenter/gun-laws/policy-areas/who-can-have-a-gun/minimum-age/#:~:text=Minimum%20age%20of%2021%20is,and%20the%20District%20of%20Columbia> (last visited October 17, 2025).

30:4C-1 to 30:4C-44. New Jersey law likewise includes young people under 21 within the group of “minors” protected by the New Jersey Uniform Transfers to Minors Act, N.J.S.A. 46:38A-2, which protects young people from poorly managing their assets.

Voters in New Jersey also understand that development and maturation do not end when one turns 18. In 2020, New Jerseyans approved an amendment to the State Constitution to make it legal for people to possess small amounts of marijuana for personal use. N.J. Const. art. IV, § 7, ¶ 13 (later implemented in N.J.S.A. 24:6I-31, et seq.). Voters limited all activities related to marijuana use, growth, and sales to “persons 21 years of age or older” N.J. Const. art. IV, § 7, ¶ 13, recognizing that “young peoples’ developmental immaturity leads them to take more risks, including experimentation with marijuana[.]” Committee Meeting of Senate Judiciary Committee, Feb. 15, 2021 (testimony of Prof. Laura Cohen). Significantly, all state governments that have legalized marijuana have done so only for people older than 21. Amanda Harmon Cooley, The Impact of Marijuana Legalization on Youth & the Need for State Legislation on Marijuana-Specific Instruction in K-12 Schools, 44 *Pepp. L. Rev.* 71, 80 (2016).

Collectively, these statutes show a long-standing and consistent societal “understanding of a juvenile’s neurological and psychological development,” People v. Parks, 510 Mich. 225, 252 (2022), namely, that it does not stop at 18.

Young people older than 18 differ from adults in the same ways as their younger counterparts. Characterizing or labeling them as adults, as the trial court did, is not reasoned analysis that justifies ignoring the constitutional and statutory requirement to consider the hallmark features of youth when sentencing them. See Comer, 249 N.J. at 395.

CONCLUSION

For all these reasons, the trial court's sentence is inconsistent with the New Jersey Constitution's requirement of proportionate punishment and is out of step with scientific evidence and societal consensus demonstrating that 18 is not the decisive age of maturation. Accordingly, this Court must reverse and remand with instructions to impose a sentencing in accordance with the law.

Respectfully submitted,

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