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What's in a Name? An Empirical Analysis of Apostrophe Laws

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ABSTRACT AND ARTICLE INFORMATION

Megan's Law. The AMBER Alert Act. Caylee's Law. The Adam Walsh Child Protection and Safety Act. These are some of the most well-known examples of "apostrophe laws," legislation named after individual victims. While prior research has typically focused on the effects of particular apostrophe laws, less research has considered them as expressions of underlying collective social phenomena. This article adds to the current literature by conducting an in-depth analysis regarding the circumstances surrounding the creation of federal apostrophe laws, the intent behind their existence, and relevant factors associated with their passage from proposed bill to enacted legislation. Based on extant research, an analytical framework was developed in which three possible explanations for the passing of apostrophe laws are explored and tested: to honor the victim, as an exploitative law-passing strategy, and as purely symbolic legislation. Although these laws tend to be dismissed as emotion-laden, reactive legislation meant to have little substance, other than to appease the public or to virtue signal, more complex dynamics are at play. In fact, our findings would suggest that, in most cases, the apostrophe law strategy is exploitative in nature, meaning that lawmakers rely on laws named after victims to pass legislation that advances their pre-existing political agendas. The present analysis of apostrophe laws' manifest and latent purposes amplifies the current knowledge on crime-related legislation by examining how extra-legal factors may influence the lawmaking process.

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Laws named after individual victims have been a staple of American legislation for several decades. In the seminal book *The Culture of Control*, Garland (2001) is among the first to offer an evaluation of these laws, referring to them as “retaliatory legislation” passed simply for “public display and political advantage” (Garland, 2001, p. 143). Although that might be the case, to grieving families they may provide an outlet for honoring a loved one or supporting a cause that promises to prevent similar victimization of others in the future. They may also signal the social salience of a new issue in the public mind, expressed in legislative proposals. Any of these explanations, or others, may accurately describe these laws, and they may operate simultaneously.

Systematically studying laws named after victims as a collective phenomenon, examining their purposes both manifest and latent, can teach us about the process of law-making in America. One indication of how diffuse and diverse these purposes may be is that no universally accepted term for these laws currently exists in the literature. In fact, “apostrophe laws,” “victims’ laws,” and even the more somber “tombstone laws” are terms that have previously been used by researchers and the media.

Throughout this article, the term “apostrophe laws” is used to refer to laws named after a person who suffered a harm or victimization that the new law is meant to prevent from happening again. Megan’s Law, the AMBER Alert Act, the Brady Act, Caylee’s Law, and the Adam Walsh Child Protection and Safety Act are a few of the most well-known and most often studied examples of apostrophe laws.

This article sets out to understand what these laws do or were meant to do, how they come about in the first place, and why they are still common legislative practice. Assessing the features these laws have in common, besides the fact that they were inspired by cases and/or events that captured public opinion at the time or immediately after they occurred, amplifies knowledge about the varied factors that influence the law-making process in America.

Based on prior research, the author developed a framework that considers and explores three different explanations for the existence of these laws: apostrophe laws as attempts to honor, apostrophe laws as an exploitative law-passing strategy, and apostrophe laws as purely symbolic pieces of legislation. Although these laws tend to be dismissed as emotion-laden, reactive legislation with little substance, the present analysis demonstrates that more complex dynamics are at play.

Literature Review

Research on Apostrophe Laws

Previous research on the topic of apostrophe laws has typically focused on the most well-known laws named after crime victims and their effects, with most studies finding the impact of these individual laws to be mixed at best. Although the goal of the current study is not to evaluate the effect (or lack thereof) of individual laws, the following paragraphs will report on selected examples representing a small sampling of the overall extant research on apostrophe laws.

For instance, Ludwig and Cook (2000) analyzed the effects on homicide and suicide rates associated with the implementation of the Brady Handgun Protection Act of 1994. The law was named after James S. Brady, Ronald Reagan’s press secretary, who was shot during the president’s attempted assassination by John Hinckley Jr on March 30, 1981 (Hermann & Ruane, 2014). The law established a nationwide requirement that licensed firearms dealers observe a waiting period and initiate a background check for handgun sales (Ludwig & Cook, 2000). The authors analyzed vital statistics data for 1985 through 1997 from the National Center for Health Statistics. After controlling for a host of relevant variables (including population age, race, poverty and income levels, urban residence, and alcohol consumption), analyses revealed that implementation of the Brady Act seemed to have been associated with reduction in firearm suicide rate for persons 55 years old or older, but not with reductions in homicide rates or overall suicide rates.

Welchans (2005) conducted a literature review of sex offender registration and community notification policy, also known as Megan’s Law. This act was named after Megan Kanka, a seven-year-old girl who was abused and murdered by her neighbor, a twice-convicted sexual offender (Goldman, 1997). Welchans found some positives associated with the law, including sex offenders finding some value to Megan’s Law in deterring future abuse, and the fact that community members generally supported the policy’s concept. However, she found that goal-oriented evaluations are not supportive of the policy’s effectiveness. The author concluded that there was no evidence to support the idea that Megan’s Law achieves its goal of actually reducing the number of recidivistic sexual assaults in the jurisdictions where it is implemented.

Finally, a study by Zgoba and colleagues (2016) compared the Adam Walsh Act (AWA) classification tiers to actuarial risk assessment instruments and existing state classification schemes

to evaluate which system was better at identifying sex offenders who had higher risk to re-offend. The authors call into question the accuracy and utility of the AWA classification system in detecting high-risk offenders and determining appropriate risk management procedures. After 5- and 10-year follow-ups, AWA Tier 3 offenders (which includes the most serious types of offenses, such as sexual contact offenses against children below the age of 13 and non-parental kidnapping of minors, and as such are considered at higher risk of recidivism) did not have significantly higher rates of recidivism than Tier 2 offenders (which includes most offenders with convictions for felony sexual abuse or sexual exploitation crimes). In fact, the authors found that in Florida, Tier 2 offenders had higher recidivism rates than Tier 3. Zgoba and colleagues concluded that the AWA sex offender classification scheme is a poor indicator of relative risk and is likely to result in a system that is less effective in protecting the public than those currently implemented in the states studied.

Besides studies empirically evaluating the effects of these acts, a more limited amount of research has focused on the rhetorical and symbolic value of individual apostrophe laws. For example, Socia and Brown (2016) examined the political rhetoric surrounding “Caylee’s Law,” legislation that would criminalize the failure to report a missing child. The law is named after Caylee Anthony, a 2-year-old girl who was murdered, and whose case came into prominence after her mother, Casey Anthony, was tried for and acquitted of her murder in 2011. The authors qualitatively evaluated statements made by state policymakers across the country in the 12 months following Casey Anthony’s acquittal. Relying on grounded theory methods, the authors concluded that the rhetoric on Caylee’s Law exemplified the tendency to mobilize political action around “triggering events” (McGarrell & Castellano, 1991) to justify legislation based on worst case scenarios and to demonize the accused in ways that reaffirm social solidarity.

While Socia and Brown’s (2016) paper was focused on a single victim law, some research has examined apostrophe laws by analyzing them as a collective social phenomenon. A 2005 paper included apostrophe laws in its analysis of crime policies enacted on behalf of particular victims (Wood, 2005). Wood argued that the practice of passing laws after individuals reinforces a persistent and troubling image of the crime victim as young, White, female, and middle class. The image put forth, she argued, has so dominated and distorted discourse about crime in the United States that makes it hard to even recognize how punishing these policies are not only for those accused, but for most crime victims as well.

Another piece that relies on a sociological approach is Kulig and Cullen’s 2017 article, in which they analyzed both State and Federal level apostrophe laws from a victimology perspective, with a focus on the race of the victims these laws are meant to honor. They concluded, in line with Wood’s (2005) analysis, that the vast majority of victims’ laws (86.3%) were meant to honor White victims. The authors concluded that their findings emphasize the “virtual invisibility of African American victims and the implicit social construction of which lives matter more in American society” (p. 978).

Theoretical Framework

As previously mentioned, very few studies (i.e., Kulig & Cullen, 2017; Wood, 2005) have conducted in-depth, collective analyses of apostrophe laws from a sociological perspective. As such, a theoretical framework that has been systematically used to explore these laws is lacking. However, by relying on theories advanced to explain broader topics, such as criminal justice models and general law-making, the author proposes three explanations that could account for the *existence* of apostrophe laws: apostrophe laws as attempts to honor victims, apostrophe laws as an exploitative law-making strategy, and apostrophe laws as purely symbolic pieces of legislation.

Honoring the Victim

A framework useful for understanding legislation enacted on behalf of victims, including apostrophe laws, is Roach’s (1999) punitive victims’ rights model of criminal process. Building on Packer’s (1964) work, Roach describes the victims’ rights model as similar in aim to the crime control model since it too emphasizes punishment as the fundamental goal of the criminal justice system, but in which the victim plays the central role.

Unlike the non-punitive victims’ rights model, which emphasizes the needs of the victims more than their rights and seeks to minimize the pain of both victimization and punishment, the punitive victims’ rights model asserts the rights of crime victims and potential crime victims as fundamental (Roach, 1999), with said respect often taking the shape of sanctions. In fact, concern about victims is framed as a form of due process and procedural justice, which serves to legitimize punitive and retributory strategies (Manikis, 2019). Under this new model, petitions and advocacy play an important role in jumpstarting the legislative process, as victims (or their representatives) are likely to demand their rights to protection from legislators and criminal justice professionals in strong and sometimes emotional ways.

These advocacy movements are often mobilized by triggering events (McGarrell &

Castellano, 1991), such as “well-publicized and horrible cases of violence” (Roach, 1999, p. 703). As a result, these efforts tend to support punitive rather than rehabilitative or reintegrative interventions, often focused on creating new criminal laws advocates hope will prevent future victimization. Roach’s explanation for these laws, in short, is that victims exert grassroots pressure on elected officials to get them passed.

Based on Roach’s (1999) evaluation, the “honoring the victim” explanation for the existence of apostrophe legislation is that they represent a response on the State’s part to victims’ families (or the victims’ themselves, if alive) and/or advocates’ demands to address or right the harm done to a loved one and others in similar situations. Under this perspective, advocacy would play a main role in elevating the concerns and demands of victims and their loved ones, centering enough attention around them to the point that legislators respond by enacting legislation meant to memorialize those who have suffered the harm.

As such, a fundamental factor in exploring if the honoring the victim explanation applies to the laws being analyzed is whether there were any significant advocacy efforts surrounding the case that inspired the legislation. Another essential feature of the honoring the victim explanation is that there is the expectation that these laws are not merely symbolic, but rather that they will have an actual impact or enact change. This can be in the form of protecting potential future victims by preventing the harm from occurring again and/or by setting up guidelines to protect victims’ rights, including their right to restitution.

It is worth considering that advocacy groups can potentially also be exploitative, and not simply be working only to further a victim’s (or their family’s) best interests or concerns. Although an analysis of this dimension of activism efforts is beyond the scope of this paper, further research might take it into account.

Exploitative Law-Passing Strategy

While Roach (1999) emphasizes the role victims and advocacy play in the creation of apostrophe laws, Garland (2001) is more skeptical in his evaluation. While Garland does claim that, at least purportedly and partially so, apostrophe laws are meant to honor victims, he emphasizes the importance of acknowledging that there is an element of exploitation inherent in that process as well. This naming practice emerged in the 1990s (Kulig & Cullen, 2017), coinciding with America’s embrace of a more punitive approach to justice and crime control that placed victims, their protection, and their rights at the center of the political discourse, to the point that “crime policy” was usually equated with “crime victim policy” (Garland, 2001; Roach, 1999; Wood, 2005).

Following Garland’s (2001) assertion that there is an element of exploitation in the process of

naming laws after individual victims, the author proposes the “exploitative law passing strategy” explanation for apostrophe laws. Under this framework, apostrophe laws are considered a method that increases the likelihood of a proposed piece of legislation being enacted into law by attaching it to a headline-making victim and case. This method is relied on by lawmakers looking to advance their personal political programs and/or to heighten their political careers.

The victim might have directly inspired the content of the legislation, but not necessarily. Rather, victims, their cases, and the advocacy efforts surrounding them offer lawmakers with windows of opportunity (Tonry, 2004) through which they can pass laws in line with their own personal and political agendas. For instance, a lawmaker with a history of a long-term punitive agenda law seeking to increase the length of prison sentences for a given charge may rely on naming a law after a popular crime victim in order to harness the support behind said case and use it in his or her favor.

Legislation relying on the apostrophe law strategy is also meant to have some impact. However, said impact has more to do with the lawmaker’s political goals than with an actual desire to address the demands of the victims’ family or advocacy groups, which are ancillary rather than fundamental under this perspective.

Pure Symbolism

A third explanation for the existence of apostrophe laws is that they are meant to be legislation that is high in symbolic value, but rather lacking in substantive impact (Kulig & Cullen, 2017). This explanation is in line with Murray Edelman’s (1964) definition of “symbolic laws.” Edelman used this term to refer to policies that are “empty political gestures,” not meant to have any actual impact on the issues they cover, but rather to mark the salience of it to the public and to placate them by seeming to be doing something about it (Calavita, 2010, p. 105).

Lawmakers’ repeated and systemic reliance on symbolic laws is possible due to the documented gap between “the law on the books and the law in action” (Friedman, 2016, p. 79), which allows them to rely on certain laws to send a political message harnessing prevailing sensibilities and public opinion (Tonry, 2004), without expecting these laws to cause any real social change.

Under the pure symbolism explanation, sponsors of apostrophe laws rely on them as grand gestures meant to placate an unruly or emotional public. Lawmakers are looking to send a message to their constituents while at the same time being fully aware that, if passed, the laws will have little to no real practical impact. Apostrophe laws that direct for a

given objective to be achieved, but do not allocate any of the funding necessary to achieve said objectives, would fit the purely symbolic explanation, as well as laws that are overly broad in their goals and directives.

With this explanatory model guiding the analysis, the present project seeks to add to the current literature on apostrophe laws in particular, and on law-making in general, by conducting an in-depth case study regarding the circumstances surrounding the creation of these particular laws, the intent behind their existence, and relevant factors associated with their passage from proposed bill to enacted legislation. More particularly, an assessment will be advanced regarding which of the three explanations is more prevalent, considering the primary characteristics of these laws.

Present Project

Only enacted Federal-level apostrophe laws were included in the present analysis. State apostrophe laws were excluded under the assumption that they would be more representative of cases that only garnered local attention. Federal apostrophe laws are arguably inspired by cases that captured attention beyond the borders of a particular State and, as such, would allow us to identify national trends associated with these laws, which is the goal of the present paper.

As previously stated, there is no one agreed-upon definition of what an "apostrophe law" is, which might be in part why their analysis as a collective social phenomenon is severely lacking. At its most basic, an apostrophe law is a type of law named after a person. However, there are a number of different types of laws that are named after individuals. For instance, every person who receives a Congressional Gold Medal has an act named after them, which directs the Speaker of the House to award the individual the honor. Naming or re-naming a United States Postal Service facility also requires a Congressional act, the title of which includes the proposed name (i.e., the Frank Leone Post Office Act). Similarly, laws regarding the designation or redesignation of national historic sites also tend to include a person's name in its title (i.e. Kate Mullany National Historic Site Act). Finally, certain appropriations bills are named after former politicians. For example, the 2019 National Defense Authorization was named after senator John McCain, who had passed away in 2018.

Although the above-mentioned laws could potentially fall under a broader understanding of named laws, they do not fit the definition of apostrophe laws that guides this paper; that is, there is no victim that has suffered a harm that the piece of legislation is meant to address or prevent in the future. For instance, acts renaming a United States Postal

Service facility or designating a national historical site do not endeavor to address or fix a past wrongdoing. The John S. McCain National Defense Authorization Act for Fiscal Year 2019 authorizes appropriations and sets forth policies regarding the military activities of the Department of Defense (Congressional Research Service, 2018a). Again, although meant to honor Senator McCain, who served in the Navy (Wilentz, 2020), the act did not set out to prevent a prior harm from happening to other people, it simply authorized appropriations to a department of the executive branch.

As such, the main criteria that guided our inclusion or exclusion of a given named law is that it is both a) named after an individual who suffered a harm (including self-harm) and b) meant to address said harm and that it seeks to prevent it from happening in the future. The methods to address the harm may vary, ranging from imposing specified criminal sentencing, to civil penalties, to authorizing for appropriations and funding, to a mix of all of the above. The harm could have been criminal in nature, but it does not necessarily need to be for an apostrophe law to address it, although it is clear that civil law related legislation is less likely to be punitive or retaliatory in its intent.

Laws were included even if the event in question led only to civil lawsuits, but not to criminal prosecution. An example is the Danny Keysar Child Product Safety Notification Act (2008), named after a 16-month-old who was strangled to death at his childcare facility when his portable crib collapsed. The crib had been recalled five years prior to the accident, but no one at the childcare facility was aware of the recall (Kids in Danger, n.d.). Although no criminal charges were brought, the Keysar family sued Hasbro and Kolcraft Enterprises, Inc., the manufacturers and distributors of the crib (Corboy & Demetrio, 2010).

Because the harm involved does not necessitate to be criminal in nature, laws named after individuals who died as a result of a particular health condition were included in the data only if the laws addressed said condition in some way, since these laws would fit our two criteria: there is an individual who suffered a harm, and the law is meant to address and prevent said harm in the future. Such was the case, for example, for the Caroline Pryce Walker Conquer Childhood Cancer Act of 2008, named after the daughter of Representative Deborah Pryce, who died from neuroblastoma (harm) at age 9 in 1999 (Riskind, 2008). This law amends the Public Health Service Act and authorizes funding towards the enhancement and expansion of pediatric cancer research (addressing the harm via allocating funding to cancer research to potentially prevent future pediatric cancer deaths).

Method

An in-depth case study of all federal apostrophe laws fitting the described criteria was conducted, relying on multiple platforms (including a Congressional database and search engine) as sources of data.

The first step was to identify relevant legislation. There is no official “list” of all laws named after victims/individuals. However, a great deal of work relating to the compilation of apostrophe laws had already been undertaken and reported by two main sources. First, the Yale Law School’s Lillian Goldman Law Library began curating a database of federal statute popular names, with the database being updated on a regular basis. Enacted laws are referred to as acts, which may also have popular names (Raphael, 2020). Laws acquire their popular names as they make their way through Congress, and almost every act is given a popular name by which it should be cited (Darvil, 2020; Legal Information Institute, n.d.).

The Lillian Goldman Law Library database allows users to sort and filter federal laws by the descriptive category of naming convention, with the Library describing their categories as an “attempt to bring some degree of order to the chaos” (Yale Law School, 2012). The categories they have assigned include abbreviation (e.g., NAFTA Worker Security Act), acrostic (e.g., USA PATRIOT Act), award (e.g., Susan B. Anthony Dollar Coin Act of 1978), description (e.g., Liquor Tax Administration Act), sponsor (e.g., Hobbs Bridge Act, aka the Truman-Hobbs Act), and victim. For this article, laws included under the “victim” category were considered for inclusion if they met the above-described criteria.

The second main source was a 2017 article by Kulig and Cullen. Their search was conducted between March 2015 and June 2016 and focused on both State and Federal apostrophe laws (Kulig & Cullen, 2017). As an appendix to the main body of the paper, the authors have a list titled “Laws named after victims (1990 – 2016).” Their list includes 51 apostrophe laws, between State and Federal. For each law, they include the name of the law/act and the date passed, the nature of the crime committed, the race/ethnicity of the victim, and a brief description of what the law does. Both the Lillian Goldman Law Library database and the Kulig and Cullen (2017) piece were searched by the author of this article in January 2019.

These initial sources were then supplemented with a comprehensive Google search of the following phrases: “victims’ laws,” “apostrophe laws,” “laws named after people,” “laws named after victims,” “laws named after children,” “named laws.” This

supplementary search was conducted between February and December 2019. This process identified a total of 47 Federal apostrophe laws, all enacted between 1990 and 2019 (see Appendix).

After constructing the list of apostrophe laws, data were collected on a number of variables including the following: 1) victim characteristics, 2) advocacy efforts in passing the law, 3) stated intent or textual content of the law, and 4) legislative variables. The main source for the data regarding the content of the law and legislative variables was the legislation collection of the U.S. Congress’s official website for U.S. federal information (Congress.gov). As per the site’s own description, it “provides access to accurate, timely, and complete legislative information for Members of Congress, legislative agencies, and the public” (Library of Congress, n.d., para. 1). Its legislation collection stores records for every bill and resolution introduced in the U.S. Congress since 1973 (93rd Congress) and every amendment introduced or submitted since 1981 (97th Congress).

For each piece of legislation (including bills that have not passed), the collection provides the following: its sponsor, its originating committee, the date the bill was introduced, the date the bill passed each of both chambers, the date it was sent to the president, and the date a bill became law. The database also provides a summary of the legislation, its full text, the titles/names used to refer to it, any amendments (if applicable), its sponsors/co-sponsors, and any related bills.

For variables related to victim characteristics and degree of advocacy, a Google search was conducted, with a focus on news coverage of the cases that inspired each of the laws included in the study. Based on an overall assessment of the above variables, the author discusses the merits of each potential explanation for the existence of apostrophe laws and suggests which explanation might be more prevalent.

Variables

Victim Characteristics

The first set of variables describe the victim or individual after whom these laws are named. When possible, data were collected on victims’ gender, race, and age at the time of the event that inspired the legislation.

Advocacy Efforts

Under the “honoring the victim” explanation for passing the laws, advocacy plays an important role in pushing them forward, so information on whether there was strong advocacy on the part of the victims, or their families, was also collected. To assess for advocacy, a Google search was conducted, including

the name of the victim plus a number of search terms including “advocacy,” “activism,” “family,” “campaign,” and “lobbying.” A dichotomous yes/no “advocacy” variable was developed for each of the 63 victims named in the sample, with each case coded as a “yes” if either the victims or their relatives had led any activism efforts to create or pass legislation. A limitation of this dichotomous variable is that it only indicates whether or not there were advocacy efforts in place without going into details regarding what exactly these efforts looked like.

Law’s Content or Purpose

Overall, what were these laws meant to do? In order to answer this question, a content analysis of the texts of each was advanced, and a number of patterns were identified. These included increasing punitiveness, updating regulations and standards, providing restitution to crime victims, and directing grants and research. Because laws tend to address a given issue from multiple levels, these patterns are not mutually exclusive (i.e., one law can increase the punitiveness of an offense while at the same time setting procedures for victim restitution).

Legislative Variables

As a way of identifying which explanation for these laws’ passage might be most prevalent, data were also collected on a number of variables related to the piece of legislation and its legislative process. These variables included the year the laws were enacted, the first time a victim’s name was mentioned in a bill, the date the law was introduced, the law’s main sponsor, the time between introduction and enactment, and whether there was any prior similar legislation introduced.

Year of Enactment

We were interested in painting a picture as to the chronologic development of the apostrophe law phenomenon, whether or not it is regular, whether it is still popular, and whether it might have been subject to political influence (e.g., are more apostrophe laws enacted in election years?).

Who Introduced it?

For each law, information regarding the chamber in which the bill originated was collected, as well as whether it was introduced by a Democrat or by a Republican. Because a single piece of legislation can have multiple co-sponsors, the affiliation of the main sponsor of the bill was considered for the analysis.

First Mention

Named laws tend to be associated with hastily thrown together legislation (Duell, 2017). Calculating when (relative to the crime or event that inspired the law) the name of a victim was first mentioned or introduced in a bill can test that

assertion. How quickly after the fact a victim’s name was used for legislative purposes, regardless of whether this initial bill failed or succeeded, is relevant for our purposes. The prediction is that this would be a relatively short period of time.

Time from Introduction to Enactment

We also analyzed how long it took between the time each of these laws were introduced to when they were finally signed into law and enacted. Since the drafting of apostrophe laws is seen as a careless and swift process, the expectation was that their enactment would be, too.

Prior Similar Legislation

The law-passing strategy explanation suggests that attaching the name of a victim to a piece of legislation would increase the odds of it passing and being enacted into law. In order to test that assertion, we searched the U.S. Congress’ official website for prior bills, not attached to a victim’s name, that had the same or highly similar content, but that had failed to become laws. Identifying a pattern of unsuccessful bills that after being renamed to be linked to a victim successfully became laws would lend credence to the law-passing explanation.

Results

Victim Characteristics

The 47 apostrophe laws in the sample are named after a total of 63 different victims. While some of the laws were named after more than one victim [e.g., Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims’ Rights Act (2004)], some victims have more than one piece of legislation named after them (e.g., Adam Walsh was the inspiration for the Code Adam Act of 2003 and the Adam Walsh Child Protection and Safety Act of 2006).

Two separate analyses were conducted. For the first set of analyses, each victim is considered only once, even if more than one law was associated with their cases. For the second set of analyses, we focused on those victims with multiple laws named after them, in an attempt to identify any patterns that could point to an association between victim characteristics and multiple laws and to understand whether this specific subset of victims is different from the overall sample.

Race

The individuals for whom race data were available were overwhelmingly White, constituting 74.60% (47 victims) of our total sample. At a distant second, African American victims accounted for 17.46% (11 victims). Other races represented are Hispanic (two victims), Asian (one victim), and Native American (one victim).

However, this racial distribution is not equal across time. The first apostrophe law identified was enacted in 1990, and eight laws passed in that decade, all named after White victims. It would take until 2000 for a law to be named after a non-White person [Hillary J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000 (Hillary J. Farias was Hispanic, Samantha Reid was White)]. The first law named after at least one African American person was the Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims' Rights Act (2004; Louarna Gillis, an African American 22-year-old woman, was murdered on January 17, 1979 as part of a gang initiation in Los Angeles). Although the victims represented by these laws were more diverse in the 2000s, only five out of 26 laws enacted in that decade were named after at least one non-White individual (19.23%).

The 2010s saw a slight increase in the number of laws named after at least one non-White victim (three laws out of 13, 23.08%). That decade also saw the enactment of the first apostrophe law named after an Asian individual (Rafael Ramos and Wenjian Liu National Blue Alert Act of 2015) and after a Native American individual (Ashlynnne Mike AMBER Alert in Indian Country Act of 2018).

Gender

Thirty-three (52.38%) of the 63 different victims honored by these laws were male, while 30 (47.62%) were female. Because the gender distribution of the victims was unexpected, further analyses looking at various combinations of gender and race of the victims were conducted (see Table 1). Twenty-four victims were White females, making up 38.10% of the total victim sample. Not lagging that much behind are White male victims, totaling 36.51% of the sample (23 victims).

Age

Age data were located for 61 of the 63 identified victims. The median age was 20 years ($SD = 14.99$), ranging from zero (Connor Peterson, who was in utero when his mother, Laci Peterson, was

murdered by his father) to 69 [Nila Lynn, who was murdered at a homeowner's association meeting by a man unhappy with the way the association had trimmed the bushes in his yard (Kyl et al., 2005)].

Victims seem to be getting progressively older as time goes by. While the average victim age was 18.75 in the 1990s, the average age increased to 20.08 in the 2000s, and to 25.412 in the 2010s. This might be explained by the fact that a number of laws in the 2010s honored victims harmed while "on-duty": five out of 13 (38.46%) in the 2010s were named after an FBI agent, police and corrections officers, and a firefighter, with the laws meant to address the harm (or the repercussions of said harm) that occurred while they were on the job.

Because of our unexpected findings regarding male victims inspiring more apostrophe laws in our sample, we conducted further analyses looking at the age of these male victims, under the assumption that male children would be more likely to inspire legislation than adult males. However, we found that only 43.75% of the male victims for whom age data were located were under 18 years old, while the majority of male victims (56.25%) were 18 or older.

Victims with Multiple Laws

Four victims had more than one piece of legislation named after them. Given the small population of this subgroup, we must be careful when considering the analyses when it comes to the gender, age, and race of these victims, as a change in these variables for only one individual would have a serious impact on the percentages and rates reported hereinafter.

Adam Walsh, who was six years old when he was abducted from a mall and subsequently murdered (History, 2009) was the inspiration for the Code Adam Act of 2003 and the Adam Walsh Child Protection and Safety Act of 2006.

Megan's Law and International Megan's Law to Prevent Child Exploitation and Other Sexual Crimes Through Advanced Notification of Traveling

Table 1: Gender and Racial Distribution of Victims that Inspired Apostrophe Laws

	Male			Female			Total	
Race	White	36.51%	(23)	White	38.10%	(24)	74.60%	(47)
	Black	11.11%	(7)	Black	6.35%	(4)	17.46%	(11)
	Other	3.17%	(2)	Other	3.17%	(2)	6.35%	(4)
	Unknown	1.59% ^a	(1)	Unknown	-	-	1.59%	(1)
Total		52.38%	(33)		47.62%	(30)	100%	(63)

^a Race information was located for 62 of the 63 victims. Information on the racial background for "Andy," a pseudonym for one of the child pornography victims who inspired the Amy, Vicky, and Andy Child Pornography Victim Assistance Act, was not located.

Sex Offenders were both named after Megan Kanka, a seven-year-old who was murdered by Jesse Timmendequas, a man who had two prior convictions for sexual assault (Goldman, 1997).

Amber Hagerman was 9 years old when she was kidnapped, and ultimately murdered, while she was riding her bike in Arlington, Texas (Barber, 2016). She has inspired three different laws: the Amber Hagerman Child Protection Act of 1996, the AMBER Alert, and Ashlynnne Mike AMBER Alert in Indian Country Act.

Finally, James Zadroga was a former NYPD detective that aided in the recovery of the World Trade Center terrorist attacks, inhaling the hazardous air at the area following the collapse. He died at 34 years of age, of severe respiratory failure. His 2006 autopsy stated that his death was directly related to the 9/11 incident (Depalma, 2006). His case inspired the James Zadroga 9/11 Health and Compensation Act of 2010 and the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act.

When it comes to gender distribution, half of the individuals who inspired multiple laws were male, while the other half were female, which is comparable to the overall sample. When it comes to racial distribution, all four individuals who inspired multiple apostrophe laws were White, compared to 74.60% of the total sample. Furthermore, when it comes to age, this subgroup of victims skewed younger than the overall sample (median = 8, *SD* = 13.39), as Adam Walsh, Megan Kanka, and Amber Hagerman were all under 10 years old.

Advocacy Efforts

When it comes to activism and advocacy, we found that 71.43% of the victims or their families were involved in advocacy efforts to pass legislation. Interestingly, if we were to consider only the cases that inspired multiple laws, we find that all four of the families of the victims engaged in advocacy efforts to get legislation passed.

Law's Content or Purpose

Punitiveness

Of the laws analyzed, 29.78% were meant to define or re-define criminal punishments, the most frequently identified purpose among the sample. And all of these laws redefined criminal sanctions to increase their punitiveness. For example, the Kilah Davenport Child Protection Act of 2003 amended the federal criminal code to increase criminal penalties against any person who commits domestic assault and who had at least two prior convictions for sexual abuse or assault, or domestic violence under state, federal, or tribal court proceedings, against a spouse or intimate

partner or against a child of, or in the care of, the person committing the domestic assault (Congressional Research Service, 2014).

Laws in this category were also meant to increase the length of the sentences for certain crimes. For instance, Aimee's Law (2000) included clauses meant to encourage states to impose sentence terms for murder, rape, or a dangerous sexual offense that were at least 10% above the average term of imprisonment imposed for that offense in all states. It also dissuaded states from granting parole release before an offender had served 85% of the sentence (Congressional Research Service, 2000b).

In certain cases, these laws were used to create new criminal charges. An example is Laci and Conner's Law, also known as the Unborn Victims of Violence Act of 2004. This law provided that "persons who commit certain Federal violent crimes ... and thereby cause the death of, or bodily injury to, a child who is in utero shall be guilty of a separate offense" (Congressional Research Service, 2004, p. 568). The law further required that the punishment for this second offense be "the same as provided under Federal law for that conduct had that injury or death occurred to the unborn child's mother" (Congressional Research Service, 2004, p. 568).

Among legislation increasing the punitiveness of criminal punishment were those meant to address "violent predators." This label includes individuals who were convicted of a criminal offense against a minor, as well as those convicted of a sexually violent offense (whether the victim is a child or not). While the cases involving offenses against a minor were variously named after both male (e.g., Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, 1994) and female (e.g., Amber Hagerman Child Protection Act of 1996) child victims, cases in which the victim was an adult were named after female victims only (e.g., Pam Lychner Sexual Offender Tracking and Identification Act of 1996).

These "violent predator" laws called for the creation of registries, databases, and notification systems that would alert the public of the whereabouts of these offenders. They also prescribed penalties for any individual who failed to properly and timely register as a violent offender. Many of these laws also included clauses that indicated certain minimum requirements that states need to meet regarding their registration and databases services, with penalties specified in case they failed to meet said requirements. Funding, grants, and allocations for the development and implementation of said systems also tended to be specified.

The length of registration determined by these laws could span from 10 years post-prison

release, to an undetermined amount of time for “sexually violent predators,” for whom the Jacob Wetterling Act mandated registration “until that person no longer suffers from a mental abnormality or personality disorder that would make the person likely to engage in a predatory sexually violent offense” (Congressional Research Service, 1994). It is evident that these laws were meant to keep offenders under the control of the criminal justice system even after they had rightfully served their time, and possibly for the remainder of their lives (Harris et al., 2010).

Updating Regulations and Standards

Of the laws in the sample, 14.89% had provisions related to updating regulations and standards of various kinds, mainly related to drug use and classification and the proper use of different types of technology. For instance, The Hillary J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000 was named after two teenage girls who died after having GHB slipped into their drinks and who were among the first publicized “GHB deaths” (in 1996 and 1999, respectively; Everything2, 2002; Yale Law School, n.d.). For approximately forty years prior to the enactment of this law, gamma-Hydroxybutyric acid had been used for legitimate medical purposes. When reports of GHB-linked illness began to emerge in 1990, the Food and Drug Administration responded by declaring it an unsafe chemical the following year (Center for Substance Abuse Research, 2013; The Associated Press, 1999).

However, GHB only became widely known as a “date rape” drug towards the end of the decade, in large part due to the deaths of Farias and Reid. In particular, Reid’s family had a strong activist presence following her death, even being credited with bringing “[a]wareness of GHB’s use to facilitate sexual assault” (Drug Enforcement Administration, 2012, para. 3). The Farias-Reid Act classified GHB as a Schedule I drug. It also amended the Controlled Substances Act (CSA) and the Controlled Substances Import and Export Act to provide additional penalties (Congressional Research Service, 2000a).

Another area in which existing regulations were updated had to do with technology, more particularly, with new ways in which it was being used. Such is the case with Amy Boyer’s Law. Boyer was a 20-year-old White woman who was murdered in 1999 by Liam Youens, a man who had cyber-stalked her for many years. He had been able to find her date of birth, social security number, and work address from an internet-based service (Douglas, 2005; Electronic Privacy Information Center, 2006).

Amy Boyer’s Law amended the Social Security Act to state that no person may display or sell to the general public any individual’s social security number or any identifiable derivative of it without the

expressed consent, electronically or in writing, of such individual. The term “display or sell to the general public” referred to intentionally placing an individual’s social security number on view on a web site available to the general public (Congressional Research Service, 2000c). The law also prohibits obtaining a social security number for purposes of locating or identifying an individual with the intent to physically injure, harm, or use the identity of the individual for illegal purposes. It further delineates prerequisites for consent, including that the individual be informed of the general purposes for which the number will be utilized and the types of persons to whom the number may be available (Congressional Research Service, 2000c).

A final example, this time related to the intersection of both drugs and technology, has to do with the Ryan Haight Online Pharmacy Consumer Protection Act of 2008. Ryan Haight was 18 years old when he died of a drug overdose in 2001, after he procured Vicodin over the Internet. The DEA found that Haight had ordered Vicodin from a doctor he had never seen in person and had it delivered by an Internet pharmacy (McKenna, 2008). The Haight Act amended the CSA to prohibit the delivery, distribution, or dispensing of a controlled substance over the Internet without a valid prescription. It also imposed registration and reporting requirements on online pharmacies that dispense one hundred or more prescriptions, or 5,000 or more dosage units of all controlled substances combined in one month (Congressional Research Service, 2008).

Restitution

A smaller number of laws in the sample (12.77%) were meant to determine steps for restitution to victims when a harm or crime has taken place. For instance, the Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims’ Rights Act of 2004 amended the federal criminal code to grant crime victims specified rights, including the right to full and timely restitution (Office for Victims of Crime, 2006).

The Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018 amended the federal criminal code to modify procedures for determining the amount of mandatory restitution in child pornography cases, increasing the victim’s possible restitution amounts available. It also established the Child Pornography Victims Reserve within the Crime Victims Fund (Congressional Research Service, 2018b). Amy Boyer’s Law also had a clause relating to restitution, authorizing persons aggrieved by violations of the law to bring civil actions in district courts to recover damages (Congressional Research Service, 2000c).

Research Efforts

Another set of victim-focused apostrophe laws are those meant to direct the development of research and support efforts related to health-related conditions leading to the death of an individual (14.89% of the sample). Examples of these laws include the Ryan White Comprehensive AIDS Resources Emergency Act of 1990, the Garrett Lee Smith Memorial Act (2004), and the Joshua Omvig Veterans Suicide Prevention Act (2007).

Legislative Variables

Year of Enactment

The distribution of apostrophe laws enacted across time has not been regular, see Figure 1. Ever since the first federal apostrophe law was enacted in 1990, there has been at least one law named after a victim created every single year. The year when the most apostrophe laws were enacted was 2008 (six laws), followed by 2000 (five). The years 2004, 2006, and 2018 each saw four laws being enacted. Eight apostrophe laws were enacted in the 1990s, 26 in the 2000s, and 13 in the 2010s.

The case that inspired the first federal apostrophe law was not criminal in nature, and it was not meant to be punitive either, but was rather pro-victim. This first law was The Ryan White CARE Act of 1990. White was diagnosed with AIDS at age 13 as a result of a blood transfusion. After being expelled due to his diagnosis, his mother fought for his right to attend school. His plight received national and international attention and has been credited with reducing bias against AIDS patients. White died in

April 8, 1990, at the age of 18 (*Ryan White*, n.d.). The Act named after him provided financial assistance to improve the quality and availability of care for individuals with HIV and their families.

Who Introduced it?

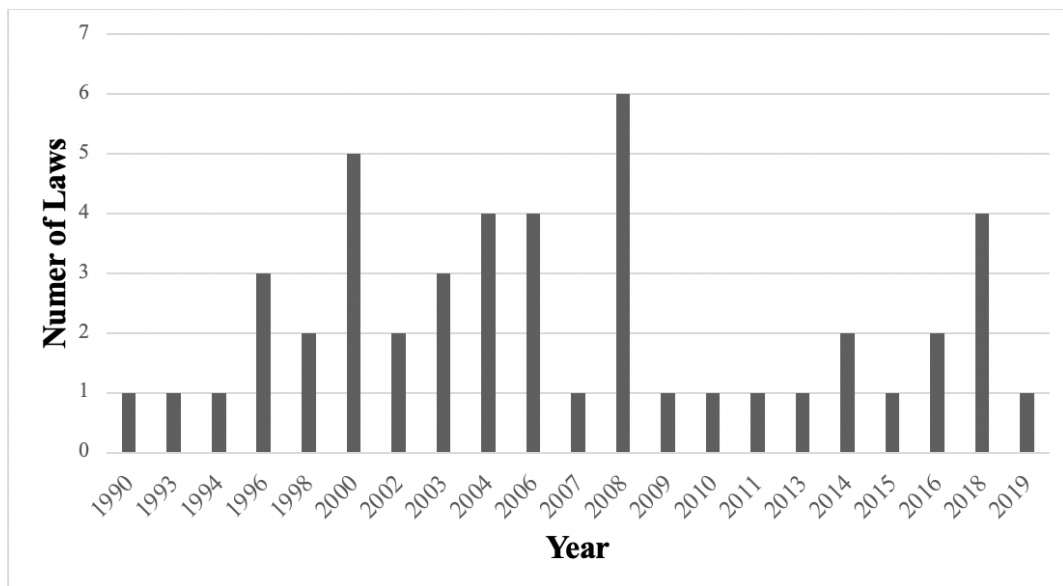
Apostrophe laws tend to overwhelmingly originate in the House (82.99%, 39 laws) rather than in the Senate (19.15%, nine). A review of Congressional records (Congress.gov) considering laws passed from the 93rd Congress to date shows that this is consistent with most passed legislation, with the House being the chamber of origin for most laws (67.90% vs. 32.10%; found via search of Congress.gov).

When it came to the party affiliation of the main sponsor, 65.96% (31) were introduced by a Republican sponsor, while 34.04% (16) were introduced by a Democrat. This is not consistent with most legislation: A search of Congress.gov revealed that, overall, Republicans are the main sponsor for laws in 40.98% of the cases, while Democrats are the main sponsor for 58.79% (the remaining percentage consists of laws sponsored by Independents).

First Mention

It takes on average 1,775.5 days (or 4.86 years) after a crime or event for a victim's name to be introduced within a bill ($SD = 8.82$ years). Even if the outlier (Emmett Till, whose murder happened in 1955, and the law named after him did not pass until 2008) is removed from the calculations, the final numbers are not significantly different ($\bar{x} = 3.73$ years, $SD = 4.92$). However, the data had limitations. First, despite best efforts, we were not able to identify the date of the crime for the victims honored by the Amy, Vicky, and

Figure 1. Enacted Apostrophe Laws per Year



Andy Child Pornography Victim Assistance Act of 2018, given that they are all pseudonyms used to protect those involved, so this law was removed from the analyses. Furthermore, for laws that mentioned more than one victim (e.g., Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act, 2009), only the first time one of the victims was mentioned was considered.

Time from Introduction to Enactment

Compared to the time that passed between crime and first mention, the time from the introduction of the bill to the enactment of the law was shorter. On average, it took 286 days (0.78 years) from the date the law was introduced until it was enacted ($SD = 169.22$). This time ranges from a maximum of 697 days (James Zadroga 9/11 Health and Compensation Act of 2010) to a minimum of 24 days (Dawson Family Community Protection Act, 2006). For reference, the average time it took a bill to become a law, from introduction to enactment, for all laws passed by the 101st United States Congress (the legislature that passed the first apostrophe law) through the 115th Congress (the last legislature to have completed its term), was 213 days (0.58 years, $SD = 178.06$).

A limitation of these calculations is that they do not take into account how many times the same piece of legislation (with the exact same name) failed before its final version passed.

Prior Similar Legislation

During the search, it was discovered that many of these apostrophe laws had previously been introduced as bills that did not involve the name of the victim whatsoever. In fact, that was the case for over half of the sample (55.32%, 26 out of 47 laws). An example is Aimee's Law, which had initially been introduced as the No Second Chances for Murderers, Rapists, or Child Molesters Act of 1998. Another example is Anton's Law (2002), first known as the Child Passenger Protection Act of 2001.

We were also able to identify three laws that were initially proposed before the crime or event in question even happened. The first case is the Haight Act (2008), which was discussed in an earlier section. Our research found that the first attempt at regulating online pharmacies can be traced back to August 5, 1999, when Representative Klink introduced a bill known as the Internet Pharmacy Consumer Protection Act. This was two years before Haight's death by overdose.

A total of three bills under the same name and with identical or highly similar content were proposed between 1999 and 2004. In 2006, Senator Sessions introduced a bill known as the Online Pharmacy Consumer Protection Act of 2006, which again had a very similar content to the three prior bills. It would take four more bills, this time including Haight's name

in them, before the final version of the Act passed in 2008.

A similar dynamic is evident with the bill that would eventually be passed as the Unborn Victims of Violence Act of 2004, a.k.a., Laci and Conner's Law. Laci Peterson went missing December 24, 2002. At the time of her disappearance, she was eight months pregnant with a son she had decided to name Conner. In April 2002, two bodies were recovered, and DNA tests confirmed they were Laci and Conner's. Scott Peterson, Laci's husband and Conner's father, was arraigned and charged with two counts of murder on April 21, 2003. Conner was included as a murder victim under California's fetal homicide law that protects any fetus over eight-weeks-old (Wakeman, 2017).

Beginning in 1999, three years before Scott Peterson was arrested and two years before Laci and Conner went missing, six different bills named Unborn Victims of Violence Act had been introduced by Republican lawmakers, with nearly identical content to what would eventually become Laci and Conner's Law. None of these six bills succeeded in becoming laws.

On May 5, 2003, 16 days after Peterson's arrest, a newly renamed bill explicitly mentioning Laci and Conner's names was introduced in the House by a coalition of 92 Republicans and five Democrats. It took 11 months for the law to pass and be enacted.

The final case identified is the Eric Williams Correctional Officer Protection Act of 2015. On Monday, February 25, 2013, while working in a housing unit at the federal prison in Canaan, Pennsylvania, Senior Officer Eric Williams was killed by an inmate (Federal Bureau of Prisons, n.d.). The Williams Act amended the federal criminal code to require the Bureau of Prisons (BOP) to issue oleoresin capsicum spray (i.e., pepper spray) to officers and employees who respond to emergency situations at high-security, medium-security, and administrative facilities (Congressional Research Service, 2016).

Approximately four years before Williams' death, a bill had been introduced proposing the development and funding of a pilot program for the use of pepper spray by correctional officers in prisons. This initial bill did not pass, and neither did a similar one in 2011. However, the Williams Act would successfully pass after being introduced only once. Furthermore, the Williams Act bypassed the pilot testing phase and directly required that the BOP issue pepper spray to its staff.

Discussion

The present analysis began by providing a detailed picture regarding the individuals who have inspired apostrophe laws. Consistent with previous research (Kulig & Cullen, 2017; Wood, 2005), we found that victims memorialized by these laws tended to be overwhelmingly White, making up almost 75% of the victim sample. When it came to gender, we unexpectedly found that most victims were male rather than female (52.38% vs. 47.62%). Furthermore, most (56.25%) of these male victims were adults (18 years or older).

Adult males do not typically fit the idea of what an “ideal victim” (Christie, 1986) looks like as portrayed in the media. In fact, Greer (2007) places young men [along with “the homeless, those with drug problems, and others existing on the margins of society” (Greer, 2007, p. 22)] at the bottom of a “hierarchy of victimization” that tends to be reflected and reinforced in media and official discourses. Then why do apostrophe laws memorialize more male victims than they do female victims?

A potential explanation for this unanticipated finding could relate to advocacy efforts. As per our findings, 62.50% of known male victims (or their families) engaged in some sort of activism or advocacy campaigns to push forward legislation associated with their case. Although the activism rate for the overall sample is higher than for the male sample, our dichotomous variable does not account for the impact, influence, or extent of the advocacy efforts put into place.

As such, it could be the case that the families of male victims engaged in particularly “impactful” advocacy and activism work. An example of a larger-than-normal advocacy campaign was waged by John Walsh, Adam Walsh’s father. Immediately following Adam’s disappearance and death, John Walsh began fiercely campaigning to raise awareness about child abduction, and in 1984, he established the National Center for Missing & Exploited Children (Grant, 2013). Four years later, he would create America’s Most Wanted, a TV show that would cement his position as a fixture in popular culture.

It is perhaps no wonder that Adam Walsh has not one, but two apostrophe laws named after him. The importance of John Walsh’s advocacy efforts in having legislation named after Adam is explicitly stated in the text of the second law named after him, titled the “Adam Walsh Child Protection and Safety Act of 2006.” In fact, that act “(r)ecognizes the commitment of John and Reve Walsh to the protection of children from child predators on the 25th anniversary of the abduction and murder of their son, Adam” (Congressional Research Service, 2006).

On the topic of advocacy efforts, we found that 71.43% of the victims or their families engaged in activism or advocacy work meant to pass legislation. Although highly common, this finding suggests that advocacy work is not a necessary factor for a law to be named after a person. By the same token, activism is also not a sufficient factor either, as there are many cases that garner media attention but that do not result in a law named after a particular individual.

When it came to the laws’ content or purpose, we were able to identify a few patterns. First, for a set of laws also known as “victim laws,” most of the legislation examined was more anti-offender rather than pro-victim. Apostrophe laws tended to be highly punitive in nature, meant to increase penalties for a specific set of charges, creating new criminal charges all together, and/or directing the development of offender registries meant to facilitate the identification, classification, management, and surveillance of individuals considered particularly dangerous. Unsurprisingly, for all of the focus on offenders, none of the laws in the sample set forth requirements regarding their rehabilitation and/or re-entry services.

We were only able to identify two sets of laws that were inherently pro-victim (rather than anti-offender). The first set of laws were those focusing on setting procedures relating to civil restitution and defense of victims’ rights within a criminal or civil proceeding (e.g., setting up processes that require providing victims with reasonable, accurate, and timely notice; acts delineating restitution procedures, etc.). The second set includes laws that allocate resources and grants for the research on and support with the health-related conditions leading to the death of an individual.

When it came to variables directly related to the legislative process, our data also allowed us to identify that the apostrophe law method is a strategy favored by Republicans in general, and by House Republicans in particular, with this latter group introducing over half of the apostrophe laws (51.96%, 24 laws; found via search of Congress.gov). We were also able to identify that, out of the four years with the highest number of enacted apostrophe laws, three (2000, 2004, 2008) were during a presidential election year, and two (2006 and 2018) were during midterm election years.

Our finding that it takes on average almost five years after the date of a given crime or event for a victim’s name to be introduced within a bill was unexpected. Given the tendency to dismiss apostrophe laws as hastily crafted laws, the expectation was that politicians would have immediately jumped on attention-grabbing cases to push forth their desired legislation.

Although that might have been the case for some of these victims (for instance, Megan Kanka's name was mentioned in a bill for the first time only 13 days after her murder), that seems to be the exception rather than the rule. The fact that certain lawmakers go back several years in order to identify an individual to name their law after indicates that apostrophe laws might be more of a deliberate and calculated strategy than would normally be assumed, and further research should examine this phenomenon and its correlates more in-depth.

An interesting finding that we came upon while conducting this present analysis was that over half of the apostrophe laws in the sample (55.32%) had previously been introduced as bills with the same or extremely similar text before, without being attached to a victim's name, and had failed to become legislation. In some cases, these bills had failed to become laws several times, up to four and five failed attempts.

Even more curious was the finding that three of these initial bills not associated with a victim had been proposed before the event or crime they were meant to have been named after even took place, making it evident that it would have been impossible for the victim to have had actually inspired said piece of legislation. These laws were the Haight Act (2008), Laci and Conner's Law, and the Eric Williams Correctional Officer Protection Act of 2015.

The play-by-play of how these pieces of legislation moved through Congress gives more insight as to the dynamics behind apostrophe laws. The fact that the enacted version of these laws was the same or extremely similar in intent and language to bills that had been proposed before the deaths of the individuals being purportedly honored emphasizes that, although the intent to memorialize these individuals' deaths is there, it is a secondary goal at best.

Finally, we were also able to calculate that, on average, it took 286 days (0.78 years) from the date the apostrophe law was introduced until it was enacted. Although shorter than the time between crime/event and first mention, this time period is not particularly brief. In fact, it is longer than the average time it took a bill to become a law for all laws passed by the 101st United States Congress through the 115th Congress.

Again, this finding is contrary to our expectations, particularly given how laws named after victims have a reputation for being reactive, rushed legislation. A potential explanation for this result is that lawmakers have realized that naming a bill after a victim does not necessarily increase the speed at which the bill becomes law. However, and based on the fact that over half of federal apostrophe laws had

previously (unsuccessfully) been introduced without being attached to a victim, this might be a strategy that does increase the probability that a law will pass. It would then make sense that lawmakers with a number of failed bills would attempt the apostrophe law method: The goal is not to pass legislation quickly, but to pass it at all.

Based on our findings, an attempt was made by the author to evaluate which of the three proposed frameworks (to honor the victim, as a law-passing strategy, purely symbolic) would better fit most of these laws. The "honor the victim" explanation emphasizes the role of advocacy by the victims or their families in influencing or creating new legislation. Although we did find that approximately three quarters of the victims or their families actively engaged in advocacy efforts with the goal of developing legislation, it would appear that activism is not a necessary factor, nor a sufficient one, to successfully get a law named after a particular victim. Furthermore, the fact that most of these laws were passed during election years (be it presidential or midterm) would suggest political motives over a genuine desire to provide a tribute to a victim.

Given the anti-offender nature of most of the apostrophe laws in our sample, we argue that the laws that would more squarely be subsumed under the "honor the victim" explanation are those that are more explicitly victim-centered, that is, those meant to allocate resources and grants related to a health condition that caused the death of a victim, and those meant to set regulations to protect crime victims' rights, including their right to restitution.

However, a closer look at this subset of apostrophe laws revealed that some of them might be more symbolic rather than actually meant to honor the victim by enacting concrete change. For example, the Joshua Omvig Veterans Suicide Prevention Act "directs the Secretary to develop and carry out a comprehensive program designed to reduce the incidence of suicide among veterans" (Congressional Research Service, 2007). However, the law does not authorize any funding to support those efforts. By proposing and passing this law, its sponsors are sending a message to their constituents emphasizing that they are doing something regarding the issue of suicide among veterans without actually allocating any of the financial resources necessary to carry out relevant interventions.

We identify a similar situation with the Caroline Pryce Walker Conquer Childhood Cancer Act of 2008. A law meant to fund childhood cancer research, it passed with unanimous consent (very few lawmakers would want to be known for taking a stand against childhood cancer). However, while the law authorizes allocations, it does not specify that the

money must actually be appropriated. It covers discretionary spending subject to the appropriations process, which would eventually take several years before allocating any monies as per the law: It was not funded in 2008 or 2009, and in 2010, the funding it did allocate fell short of the promised/expected amounts (Beamer, 2009).

In line with the “exploitative law-passing” explanation, findings showed that apostrophe laws seem to be less of a passion-driven, hastily put together endeavor than is commonly assumed. First, it was found that there is an average five-year delay between the event or crime and the first time the victim is mentioned in a bill, which belies the notion that these laws are nothing but a hurried move by politicians, be it due to symbolic or truly memorializing reasons. Instead, it suggests that lawmakers willfully identify victims whose stories lend themselves to their proposed legislation, going back even several years to do so, and they do it to increase the chances that their favored bills will pass.

Our data also showed that over half of apostrophe laws had originally been introduced without making any references to the victims they were meant to be honoring, sometimes multiple times. Only when said bills were attached to a victim’s name did they successfully pass and become laws. Moreover, three laws in the sample were first proposed before the event or crime in question even took place. These findings depict a reality in which lawmakers had a piece of legislation they were interested in passing. After several failed attempts, associating this bill to a headline-making case and victim was a successful strategy to finally pass the desired law, and with it, to further their own political goals.

Conclusion

This article provides an exploratory look at federal apostrophe laws, analyzing them as a collective phenomenon with a focus on what they can teach us about the process of law-making. The data collection and analysis were further guided by a framework considering three different explanations behind the existence of these laws: to honor victims, as an exploitative law-passing strategy, and as purely symbolic.

While the results do not allow to categorically reject any of the proposed explanations, they seem to suggest that the “honor the victim” explanation is not enough to account for most of the Federal laws in the sample. This explanation centers the role advocacy and activism have in law-making. However, our findings showed that almost 30% of the victims honored by this law lacked the activism work the “honor the victim” explanation would deem central

to the passage of a law memorializing an individual. Furthermore, this explanation would require that each piece of legislation be directly inspired by the named victim. The fact that over half of the laws in the sample had been originally introduced as bills not associated or linked to any given victim would suggest that it is not the case.

However, our findings also undercut the notion that all apostrophe laws are exclusively symbolic in nature. While that might be the case for some, the fact that lawmakers seem to cherry-pick a victim, sometimes going back several years to select the ideal case, and the existence of prior unsuccessful bills not associated with a victim (some of them introduced even before the crime/event in question) suggest that the pure symbolism explanation might be a bit reductionist. In fact, based on the data, it would seem more likely that the “apostrophe law strategy” is instrumentalist: Lawmakers rely on it to pass legislation that advances their pre-existing political agendas.

The evidence supporting the law-passing and symbolic explanations underscore the existence of the oft-studied gap between the law on the books and the law in action (see Friedman, 2016). However, the data allow us to go further and to identify different facets to this gap. The “honor the victim” explanation assumes the law is meant to have the impact its text requires, that is, honoring a given victim by addressing the harm in question. With the law-passing strategy, the law is meant to have some impact, not necessarily that of memorializing an individual victim, but rather an impact that is in line with the sponsor’s political program. On the other hand, with the symbolic explanation, there is no expectation that the law will have an impact beyond ingratiating a politician or lawmaker to its constituency by sending a message about where they stand on a given issue.

Overall, the findings in this article allow us to consider apostrophe laws from novel perspectives, emphasizing how complex the process of law-making in America is. When it comes to the passing of apostrophe laws in particular, and legislation in general, our conclusions emphasize the need to consider the many conflicting influences that are at play behind each piece of legislation lawmakers propose, the intent of each bill, and the fundamental importance of extra-legal factors in the law-making process.

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Appendix

Federal Apostrophe Laws, Sorted by Date of Enactment

	Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
1.	Ryan White Comprehensive AIDS Resources Emergency Act of 1990	03/06/90	Senate	Democrat	08/18/90	White	Male	18	<p>Amends the Public Health Service Act to provide funding and grants to States to improve the quality, availability, and organization of health care and support services for individuals and families with HIV disease.</p> <p>Named after Ryan White, who was diagnosed with AIDS at age 13 and who had become a champion for the rights of people with AIDS. White died on April 8, 1990.</p>
2.	Brady Handgun Violence Prevention Act	02/22/93	House	Democrat	11/30/93	White	Male	40	<p>Amends the Federal criminal code to establish a national instant criminal background check system for handgun purchases, including a five-day waiting period</p> <p>Named after James S. Brady, Ronald Raegan's press secretary, who was shot during Raegan's assassination attempt on March 30, 1981.</p>
3.	Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act	10/26/93	House	Democrat	09/13/94	White	Male	11	<p>Establishes guidelines that require individuals convicted of criminal offenses against minors and/or of sexually violent offenses to be registered in State databases.</p> <p>Named after Jacob Wetterling, who was kidnapped on October 22, 1989, and subsequently murdered.</p>
4.	Megan's Law	07/27/95	House	Republican	05/17/96	White	Female	7	<p>Requires State and local law enforcement agencies to release relevant information that is necessary to protect the public regarding people required to register under a State registration program established under the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act.</p> <p>Named after Megan Kanka, who was kidnapped and murdered on July 29, 1994 by a man who had two prior convictions for sexual assault.</p>
5.	Amber Hagerman Child Protection Act of 1996	03/28/96	House	Republican	09/30/96	White	Female	9	<p>Amends the definition of aggravated sexual assault of a minor, including an increase in penalties for repeat sexual assault offenders, who would now be sentenced to life (unless the death penalty is imposed).</p>

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
								Named after Amber Hagerman, who on January 13, 1996 was abducted, and subsequently murdered, by an unidentified offender.
6. Pam Lychner Sexual Offender Tracking and Identification Act of 1996	04/16/96	Senate	Republican	10/03/96	White	Female	31	Amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act to establish a national database at the Federal Bureau of Investigation to track individuals convicted of a criminal offense against a minor or a sexually violent offense and/or who is a sexually violent predator.
								Named after Pam Lychner, who was attacked by a man with prior rape and child molestation charges.
7. Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act	01/7/97	House	Republican	10/07/98	White	Female	19	Renames the Crime Awareness and Campus Security Act of 1990. Additionally, it set new requirements for disclosure of campus security policy and campus crime statistics.
								Named after Jeanne Clery, who was raped and murdered by a man who broke into Clery's dorm room in Lehigh University through a series of three doors that had been propped open by pizza boxes.
8. Ricky Ray Hemophilia Relief Fund Act of 1998	03/11/97	House	Republican	11/12/98	White	Male	15	Establishes in the Treasury the Ricky Ray Hemophilia Relief Fund, meant to provide compassionate funding to individuals with blood-clotting disorders who contracted HIV through the use of antihemophilic factor administered between July 1, 1982, and December 31, 1987.
								Named after Ricky Ray, a teenager who was infected with HIV due to a transfusion of HIV-contaminated blood products used to treat his hemophilia. He died due to AIDS complications on December 13, 1992.
9. Hillory J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000	06/10/99	House	Republican	02/18/00	-	-	-	Modifies the Controlled Substance Act to categorize gamma-hydroxybutyric acid (GHB) as a Schedule I controlled substance.
				Farias Reid	Hispanic White	Female Female	17 15	Named after Hillory J. Farias and Samantha Reid, who died after GHB was slipped into their sodas, in 1996 and 1999, respectively.
10. Jennifer's Law	02/12/99	House	Republican	03/10/00	White	Female	21	Authorizes grant awards to enable States to improve the reporting of unidentified and missing persons.

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law	
								Named after Jennifer Wilmer, who went missing while hitchhiking in California on September 13, 1993.	
11. Aimee's Law	11/08/99	House	Republican	10/28/00	White	Female	22	Requires States to pay for the prosecution and incarceration of any violent felons who commit crimes in other States after being paroled.	
								Named after Aimee Willard, who was kidnapped, raped, and killed by a convicted murderer who had been paroled from a Nevada prison in 1996, before fully completing his term.	
12. Kristen's Act	08/05/99	House	Republican	11/09/00	White	Female	18	Establishes grants for programs to assist law enforcement and families in locating missing adults. It also creates a national, interconnected database for the purpose of tracking missing adults.	
								Named after Kristen Modafferi, a college student who disappeared in San Francisco in 1997.	
13. Amy Boyer's Law	07/25/00	Senate	Republican	12/21/00	White	Female	20	Amends the Social Security Act to bar the public display of any individual's social security number, or any identifiable derivative of such number, without the expressed consent, electronically or in writing, of such individual. It also provides for restitution for victims.	
								Named after Amy Boyer, who was murdered by a man who had cyber-stalked her for many years prior and who had been able to find her date of birth, SSN, and work address from an internet-based service.	
14. James Guelff and Chris McCurley Body Armor Act of 2002	06/19/01	House	Republican	11/02/02	-	-	-	Increases penalties for any crime of violence or drug trafficking crime in which the defendant used body armor. It also amends the Brady Handgun Violence Prevention Act to prohibit the purchase, ownership, or possession of body armor by violent felons.	
					Guelff	White	Male	40	Named after officer James Guelff, who was shot and killed by a carjacking suspect wearing a ballistic helmet, a flak jacket, and carrying hundreds of rounds of ammunition.
					McCurley	White	Male	48	Named after Captain McCurley, who was shot and killed by suspects equipped with an AK-47 and wearing body armor.

	Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
15.	Anton's Law	10/01/02	House	Republican	12/04/02	White	Male	4	<p>Directs the Secretary of Transportation to conduct a rulemaking proceeding to establish performance requirements for child restraints, including booster seats, for children weighing more than 50 pounds.</p> <p>Named after Anton Skeen, a child killed in a rollover collision. He was using a seatbelt made for adults, which caused him to slide out from underneath it and be thrown from the vehicle.</p>
16.	AMBER (America's Missing: Broadcast Emergency Response) Alert	01/13/03	Senate	Republican	04/30/03	White	Female	9	<p>Sets guidelines for a national-level AMBER alert system to be activated when a person goes missing. Establishes minimum standards for an AMBER alert to be issued, and provides funding to States to develop and improve their AMBER alert protocols.</p> <p>Named after Amber Hagerman, who on January 13, 1996 was abducted, and subsequently murdered, by an unidentified offender.</p>
17.	Code Adam Act of 2003	1/13/03	Senate	Republican	04/30/03	White	Male	6	<p>Requires that public buildings establish procedures for locating a child who is missing in the building.</p> <p>Named after Adam Walsh, who was abducted from a mall outside of a store. On August 10, 1981, his severed head was discovered 100 miles from the abduction site.</p>
18.	Suzanne's Law	01/13/03	Senate	Republican	04/30/03	White	Female	19	<p>Changed from 18 to 21 the age under which any law enforcement agency must report a missing person to the National Crime Information Center.</p> <p>Named after Suzanne Lyall, a college student that went missing in 1998 in Albany, New York.</p>
19.	Laci and Conner's Law	05/07/03	House	Republican	04/01/04	-	-	-	<p>Provides that persons who commit certain Federal violent crimes causing the death of, or bodily injury to, a child who is in utero be guilty of a separate offense. It also requires that the punishment for that separate offense be the same as provided under Federal law for that conduct had that injury or death occurred to the unborn child's mother.</p>
					Laci Peterson	White	Female	26	<p>Named after Laci Peterson, who went missing on Christmas Eve 2002 while she was eight months pregnant with a son she had named Connor. Four months later, their</p>
					Conner Peterson	White	Male	0 (in utero)	

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
								bodies were located. Laci's husband and Conner's dad, Scott Peterson, was eventually charged with two counts of murder.
20. Garrett Lee Smith Memorial Act	07/08/04	House	Democrat	10/21/04	White	Male	21	Requires the Substance Abuse and Mental Health Services Administration to award grants for research, training, and technical assistance related to the development or continuing of statewide or tribal suicide early intervention and prevention strategies. Named after Garrett Lee Smith, who completed suicide on September 3, 1993.
21. Debbie Smith Act	09/21/04	House	Democrat	10/30/04	White	Female	34	Amends and expands the DNA Analysis Backlog Elimination Act of 2000 to allow grants to units of local governments as well as States. Directs that these grants go toward timely analyses of DNA samples, including samples from rape kits, samples from other sexual assault evidence, and from cases without an identified suspect. Named after Debbie Smith, who was kidnapped and raped by a stranger on March 3, 1989. Her perpetrator was caught over six years later when the rapist's DNA was run through CODIS (Combined DNA Index System).
22. Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims' Rights Act	09/21/04	House	Republican	10/30/04	-	-	-	Amends the Federal criminal code to grant crime victims the right to be reasonably protected from the accused, to notifications regarding court proceedings and/or parole proceeding regarding the crime, to be heard at any public procedure, to full and timely restitution, to proceedings free from unreasonable delay, and to be treated with fairness and respect.
				Campbell	White	Male	27	Named after Scott Campbell, who went missing (and who was subsequently murdered) on April 16, 1982. During the trials, Scott's family was barred from entering the courtroom, and they were never notified of relevant proceedings.
				Roper	White	Female	22	Named after Stephanie Roper, who was kidnapped and murdered by two men after her car broke down on April 3, 1982. During the trials of the killers, the court excluded Stephanie's family from the courtroom and never notified them of continuances.

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
				Preston	White	Female	22	Named after Wendy Preston, who was murdered on June 23, 1977. Her parents were not properly notified of relevant court proceedings.
				Gillis	Black	Female	22	Named after Louarna Gillis, who was murdered on January 17, 1979 as part of a gang initiation in Los Angeles. The family was not notified of critical proceedings in the killer's trial.
				Lynn	White	Female	69	Named after Nila Lynn, who was murdered at a homeowner's association meeting on April 19, 2000. Her husband wanted the killer to be sentenced to life without parole, rather than live through the lengthy appeals of a capital case. Despite having constitutional and statutory rights, he was not allowed to make a sentencing recommendation.
23. Adam Walsh Child Protection and Safety Act of 2006	12/08/05	House	Republican	07/27/06	White	Male	6	<p>Establishes a comprehensive national system for the registration of sex offenders and offenders against children. It further establishes a three-tier classification system based upon specified criteria, including the seriousness of the underlying offense and the age of any child involved.</p> <p>Named after Adam Walsh, who was abducted from a mall outside of a store. On August 10, 1981, his severed head was discovered 100 miles from the abduction site.</p>
24. Dru's Law	12/08/05	House	Republican	07/27/06	White	Female	22	<p>Establishes the Dru Sjodin National Sex Offender Public Website, which provides information to the public on the whereabouts of registered sex offenders regardless of State, territory or tribal boundaries.</p> <p>Named after Dru Sjodin, who was kidnapped and murdered by a Level 3 Minnesota registered sexual offender who had been released from prison after a 23-year sentence only six months prior to Dru's disappearance.</p>
25. Masha's Law	12/08/05	House	Republican	07/27/06	White	Female	5	<p>Gives victims of child pornography the right to sue anyone who produces, distributes, or possesses their child sex abuse images, and it increases the minimum level of damages victims can seek.</p> <p>Named after "Masha" (pseudonym), who was adopted by an American man who sexually</p>

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
								abused her for years and posted her pictures online.
26. Dawson Family Community Protection Act	12/05/06	House	Republican	12/29/06	-	-	-	Requires the allocation of at least 7 million dollars for high intensity drug trafficking areas with severe neighborhood safety and illegal drug distribution problems. Said funding is required to be used to ensure the safety of communities and preventing intimidation of potential witnesses of illegal drug distribution and to combat illegal drug trafficking.
				Angela Dawson	Black	Female	36	
				Carnell Dawson	Black	Male	43	
				Keith Dawson	Black	Male	8	
				Kevin Dawson	Black	Male	8	
				Carnell Dawson, Jr.	Black	Male	10	
				Juan Ortiz	Black	Male	10	Named after the Dawson family, who were killed in their own home in 2002 as retaliation for reporting drug activity in their neighborhood.
				LaWanda Ortiz	Black	Female	14	
27. Joshua Omvig Veterans Suicide Prevention Act	01/09/07	House	Democrat	11/05/07	White	Male	22	Directs the development and implementation of a comprehensive program designed to reduce the incidence of suicide among veterans.
								Named after army reservist Joshua Omvig, who completed suicide while home during Thanksgiving a week after he returned from Iraq.
28. Cameron Gulbransen Kids Transportation Safety Act of 2007	02/27/07	House	Democrat	02/28/08	White	Male	2	Establishes a rule that requires all vehicles under 10,000 pounds, including buses and trucks, to come equipped with rear-visibility technology.
								Named after Cameron Gulbransen, who was killed when his father backed over him in the driveway.
29. Caroline Pryce Walker Conquer Childhood Cancer Act of 2008	03/15/07	House	Republican	07/29/08	White	Female	9	Requires the Secretary of Health and Human Services to continue to enhance, expand, and intensify pediatric cancer research and other activities related to pediatric cancer.
								Named after the daughter of Rep. Deborah Pryce (sponsor) who died from neuroblastoma in 1999.
30. Danny Keysar Child Product Safety Notification Act	11/01/07	House	Democrat	08/14/08	White	Male	1	Requires the Consumer Product Safety Act to promulgate enhanced consumer product safety standards for infant or toddler products. Makes it a violation to manufacture, sell, lease, or otherwise place in the stream of commerce any crib that is not in compliance with such standard.
								Named after Daniel Keysar, who was strangled to death when his portable crib collapsed. The crib had been recalled in 1993.

	Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
31.	Emmett Till Unsolved Civil Rights Crime Act	02/08/07	House	Democrat	10/07/08	Black	Male	15	<p>Directs the Criminal Section of the Civil Rights Division of the Department of Justice to investigate and prosecute violations of criminal civil rights statutes in which the alleged violation occurred before January 1, 1970 and resulted in death.</p> <p>Named after Emmett Till, an African-American boy from Chicago, who was brutally murdered in Mississippi for allegedly flirting with a white woman in 1955.</p>
32.	Michelle's Law	06/25/07	House	Democrat	10/09/08	White	Female	22	<p>Prohibits a group health plan from terminating coverage of a dependent child due to a medically necessary leave of absence from a postsecondary education institution while such child is suffering from a serious illness or injury.</p> <p>Named after Michelle Morse, who was diagnosed with colon cancer while a student at Plymouth State University. Michelle received health insurance through her mother's employer-sponsored plan, which required her to be a full-time student to qualify for coverage. As such, Michelle had to continue to be enrolled as a full-time student while receiving chemotherapy and other treatments.</p>
33.	Ryan Haight Online Pharmacy Consumer Protection Act of 2008	06/24/08	House	Democrat	10/15/08	White	Male	18	<p>Amends the Controlled Substances Act to prohibit the delivery, distribution, or dispensing of a controlled substance that is a prescription drug over the Internet without a valid prescription.</p> <p>Named after Ryan Haight, who died of a drug overdose in 2001 after he procured Vicodin over the Internet, prescribed by a doctor who he had never seen.</p>
34.	Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act	06/02/09	House	Democrat	10/28/09	-	-	-	<p>Provides funding and technical assistance to State, local, and tribal jurisdictions to help them to more effectively investigate and prosecute hate crimes. It also creates a new law criminalizing willfully causing bodily injury when the crime was committed because of the actual or perceived race, color, religion, national origin of the victim.</p>
					Shepard	White	Male	21	<p>Named after Matthew Shepard, who was robbed, tortured, and left for dead tied to a fence by two men</p>

Law Name	Date Introduced	Chamber of Origin	Main Sponsor Affiliation	Date Enacted	Victim Race	Victim Gender	Victim Age	Summary of the Law
				Byrd, Jr.	Black	Male	49	who targeted him due to his sexual orientation. Named after James Byrd Jr., who was beaten, taunted, and urinated on by three white men. Finally, they chained him by the ankles to the back of the truck and dragged him down a deserted rural road. He was targeted due to his race.
35. Special Agent Samuel Hicks Families of Fallen Heroes Act	06/04/09	House	Republican	06/09/10	White	Male	33	Authorizes law enforcement agencies to pay the transportation and moving expenses attributable to a change of residence within the United States of the immediate family of a covered employee who dies as a result of personal injury sustained while on duty. Named after Special Agent Samuel S. Hicks, who was killed on November 19, 2008 while executing a federal arrest warrant.
36. James Zadroga 9/11 Health and Compensation Act of 2010	02/04/09	House	Democrat	01/02/11	White	Male	34	Provides for medical treatment and financial compensation for the responders and survivors who are sick from exposure to toxins at Ground Zero on 9/11, as well as those sick from exposures at the Pentagon and Shanksville, Pennsylvania sites. Named after James Zadroga, a former New York City police detective whose death in 2006 was the first attributed to his exposure to toxic dust at Ground Zero during 9/11.
37. Katie Sepich Enhanced DNA Collection Act of 2012	06/21/12	House	Democrat	01/10/13	White	Female	22	Directs the Attorney General to make grants to assist states with the costs associated with the implementation of DNA arrestee collection processes. Named after Katie Sepich, who was raped, strangled to death, and set on fire in 2003. Her killer was identified three years later, after DNA from taken the scene and uploaded to the Combined DNA Index System (CODIS) matched that of a man convicted of other crimes.
38. Kilah Davenport Child Protection Act of 2013	12/02/13	House	Republican	05/20/14	White	Female	3	Amends the federal criminal code to apply certain increased criminal penalties against any person who commits domestic assault and who has at least two prior convictions related to the assault, sexual abuse, or a serious violent felony against a spouse or intimate partner or against a child of, or in the care of, the person committing the domestic assault.

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								Named after Kilah Davenport, who died after her stepfather shoved her head through the wall of their home.
39. Sean and David Goldman International Child Abduction Prevention and Return Act of 2014	09/28/13	House	Republican	08/08/14	-	-	-	Directs the Secretary of State to submit to Congress an Annual Report on International Child Abduction, which shall determine whether each listed country has engaged in a pattern of noncompliance in cases of child abduction during the preceding 12 months.
				Sean Goldman	White	Male	5	
				David Goldman	White	Male	Unknown	Named after Sean and David Goldman. In 2004, Sean was taken by his mother on a two-week vacation to her native Brazil. Once there, she informed David over the phone that she was divorcing him and keeping Sean in Brazil.
40. Rafael Ramos and Wenjian Liu National Blue Alert Act of 2015	03/40/15	Senate	Democrat	05/19/15	-	-	-	Establishes a national Blue Alert communications network within the Department of Justice (DOJ). The Blue Alert is meant to share information regarding the serious injury or death of a law enforcement officer in the line of duty, an officer who is missing in connection with the officer's official duties, or an imminent and credible threat that an individual intends to cause the serious injury or death of a law enforcement officer.
				Rafael Ramos	Hispanic	Male	40	
				Wenjian Liu	Asian	Male	32	Named after NYPD officers, Wenjian Liu and Rafael Ramos. While on patrol in 2014, a gunman walked up to the passenger-side window of their car and shot several rounds into the heads and upper bodies of the officers, killing them.
41. International Megan's Law to Prevent Child Exploitation and Other Sexual Crimes Through Advanced Notification of Traveling Sex Offenders	01/22/15	House	Republican	02/08/16	White	Female	7	Directs the Department of Homeland Security (DHS) to establish the Angel Watch Center within the U.S. Immigration and Customs Enforcement. The center may receive and transmit notification of international travel by sex offenders. It may also share information about sex offender travel with other government agencies.
								Named after Megan Kanka, who was kidnapped and murdered on July 29, 1994 by a man who had two prior convictions for sexual assault.
42. Eric Williams Correctional	01/22/15	House	Republican	03/09/16	White	Male	34	Amends the federal criminal code to require the Bureau of Prisons

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Officer Protection Act of 2015								(BOP) to issue oleoresin capsicum spray (pepper spray) to officers and employees who respond to emergency situations at high-security, medium-security, and administrative facilities. Named after Senior Officer Eric Williams, who was killed by an inmate while on duty at Canaan United States Penitentiary.
43. Kari's Law Act of 2017	01/17/17	House	Republican	02/16/18	White	Female	31	Amends the Communications Act of 1934 to prohibit businesses from manufacturing, selling, buying, and using multi-line telephone systems unless they are pre-configured to allow users to directly initiate a call to 9-1-1 without dialing any additional digit, code, prefix, or post-fix. Named after Kari Hunt Dunn, who was fatally stabbed by her estranged husband on December 1, 2013 in a hotel room. The couple's 9-year-old daughter made four attempts to dial 9-1-1, which were unsuccessful because she didn't realize she had to first dial an extra "9" to reach an outside line.
44. Ashlynnne Mike AMBER Alert in Indian Country Act	03/29/17	Senate	Republican	04/13/18	Native American	Female	11	Directs the integration of tribal AMBER Alert systems into state AMBER alert systems, and makes Indian tribes eligible for AMBER Alert grants. Ashlynnne Mike and her nine-year-old brother were kidnapped on May 2, 2016. Ashlynnne was subsequently sexually molested and bludgeoned to death with a tire iron.
45. Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018	11/16/17	Senate	Republican	12/07/18	-	-	-	Amends the federal criminal code to modify procedures for determining the amount of mandatory restitution in child pornography cases, effectively increasing the total restitution a victim can receive. Named after the victims in some of the world's most widely circulated child pornography series (pseudonyms).
46. Ashanti Alert Act	02/20/18	House	Republican	12/31/18	Black	Female	19	Directs the Department of Justice (DOJ) to establish a national communications network—the Ashanti Alert communications network—to support regional and local search efforts for missing adults. Named after Ashanti Billie, who disappeared on September 2017.

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								Her body was found two weeks later. At 19 years old, Billie was too old for an AMBER Alert, the child abduction alert system, and too young for a Silver Alert, the system for locating missing seniors.
47. Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act	02/25/19	House	Democrat	07/29/19	-	-	-	Funds through FY2092 the September 11th Victim Compensation Fund of 2001.
				Zadroga	White	Male	34	Named after Zadroga (NYPD detective), Pfeifer (NYPD detective), and Alvarez (FDNY firefighter), respondents on 9/11 who died of complications related to their time at Ground Zero.
				Pfeifer	White	Male	59	
				Alvares	White	Male	53	