

Who Dunit? Gangs, Joint Enterprise, Bad Character and Duress

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Abstract

In cases where it is alleged that an offence is perpetrated by a gang, but where there is no definitive, eye-witness evidence of involvement, the prosecution's case often rests upon the presumption that a person, by dint of their prior association with 'known gang members', and hence their understanding of and commitment to the aims, purposes and modus operandi of the gang, is engaged in a 'joint enterprise' to perpetrate that offence. The charge of joint enterprise is often supported by a submission of evidence of the defendant's 'previous bad character'. However, because of the lack of any generally agreed definition of gang involvement, the complex patterns of association in gang-affected neighbourhoods, the sometimes questionable relevance of the evidence deployed to support a submission of previous 'bad character' and the fact that the alleged perpetrators are not infrequently subject to some degree of implicit or explicit coercion or duress, establishing the defendant's actual culpability is fraught with difficulty and there is, therefore an ever-present danger of injustice. In this article I explore the patterns of association between young people in gang affected neighbourhoods and the ways in which the law and policing practice understands, and sometimes misunderstands these relationships. I then suggest a set of definitions which could help to clarify the actual nature and degree of an individual's association with a youth gang.

Key Words: Gangs, Prosecution, Joint Enterprise, Duress, Bad Character

UNLIKE THE UK, in the USA most states have anti-gang statutes. Some states such as Georgia, Texas and California simply prohibit '*participation in criminal street gangs*'. The California Penal Code, for example, states that:

Any person who actively participates in any criminal street gang with knowledge that its members engage in or have engaged in a pattern of criminal gang activity, and who wilfully promotes, furthers, or assists in any felonious criminal conduct by members of that gang, shall be punished by imprisonment in a county jail for a period not to exceed one year, or by imprisonment in the state prison for 16 months, or two or three years.

Several states, like Florida and Kentucky, make it a crime for a person to recruit somebody else into a gang, while others, like New Jersey, allow schools to prohibit students from wearing 'gang

apparel'. In most states, gang-related offences attract 'enhanced penalties'. In Alaska, for example, if a gang-involved person commits an offence that would otherwise be classified as a *Class A misdemeanor*, the offence is reclassified as a *Class C felony*, thus incurring a harsher penalty.

Yet these anti-gang statutes remain contentious. In their response to the introduction of the 2013 Chicago, *Street Gang Racketeer Influenced and Corrupt Organizations Statute*, (a.k.a. the *Gang RICO*) (NBC Chicago, 2013) the *Chicago Justice Project*, a consortium of lawyers and community groups, pointed to the problem that:

The crux of this law is the ability of the legal system to determine if the youth in question is a member of a gang. But providing a reliable and consistent way of determining an individual's gang membership is no simple task. Without their ability to determine which offender is and is not in a gang in a reliable fashion means many kids are going to get sentenced to prison terms through 'guilt by association' rather than any true aggravating factor associated with their case. (Chicago Justice, 2013)

This is a problem which also dogs the legal system in England and Wales, despite the fact that the only specific anti-gang statute currently available to the police and prosecutors is the *Gang Injunction*, commonly known as the *Gangbo* because of its similarity to an ASBO. Introduced in the *Policing and Crime Act (2009)*, police and local authorities may apply to a county court for a gang injunction against individuals whom they believe, on the balance of probabilities, to be involved in gang-related violence. Unlike the US statutes, the gang injunction is designed, first and foremost, to divert the subject from gang involvement rather than punish them for it.

However, in the past decade in England, the common law doctrine of *Joint Enterprise* has been utilised by prosecutors as a de facto anti-gang statute with which to target adolescents and young adults allegedly involved in street gangs. The offence of *Joint Enterprise* is said to have been introduced in 1536 as a means of prosecuting duellers and their associates. Today, under *Joint Enterprise*, a person may be found guilty for a crime apparently committed by another person if they *knowingly assist or encourage the crime and agree to act together for a 'common purpose'*, in which case each member of the group assumes responsibility for the actions of the others. Law has both a regulatory and an educative role and the police tend to favour prosecutions of gang members under the doctrine of *Joint Enterprise* because they believe it sends a powerful deterrent message to would-be affiliates about the perils of gang involvement. It is also a comparatively efficient way of dealing with a plurality of perpetrators.

Inevitably perhaps, because it introduces a lower standard of proof into the legal equation, Joint Enterprise has many critics. The *Prison Reform Trust* is concerned that it can act as '*a drag-net, bringing individuals and groups into the criminal justice system*' unnecessarily. The campaigning group JENGBA (*Joint Enterprise – Not Guilty by Association*) contends in its on-line literature

that Joint Enterprise confuses juries because they see that some defendants are more culpable than others, while some are probably innocent, but are instructed by judges *to either convict or acquit the whole group*. However, no actual cases in which this occurred are cited.

As with the Chicago *Gang RICO*, the central question in the case of Joint Enterprise concerns how the police and the prosecution establish who is, and who is not, a ‘gang member’. In January 2012 the Cross Party Justice Committee (House of Commons, 2012) published a report recommending that, as a matter of urgency, the Director of Public Prosecutions (DPP) issue guidance on the use of joint enterprise when charging decisions are made and, in particular, on the relationship between association and complicity in gang-related violence and homicide because, while there is a fairly widely accepted definition of a gang ...

A relatively durable, predominantly street-based group of young people who (1) see themselves (and are seen by others) as a discernible group, (2) engage in a range of criminal activities and violence, (3) identify with or lay claim over territory, (4) have some form of identifying structural feature, and (5) are in conflict with other, similar, gangs. (Pitts, 2008, Centre for Social Justice, 2009)

... there is no clear definition of ‘gang membership’.

Evidential Ambiguity

Few Jurors are likely to have trawled cyberspace in search of *YouTube* renditions of ‘gangsta’ rap, and so their main source of information about social relationships between young people in gang affected neighbourhoods will come via the media and the Crown Prosecution Service.

In London, at least, police evidence in gang-related cases is distinctive. It tends to take the form of a listing by specialist police officers of analogous cases that have been successfully prosecuted in the past. This listing is accompanied by a quasi-anthropological account of the *raison d’etre*, culture, values, attitudes, structure, dynamics, activities and *modus operandi* of the youth gang. In this preamble particular attention is paid to the distinctive language, signs and symbols employed by youth gangs, their musical tastes and their propensity to produce sensational RAP videos. This prologue is designed to demonstrate the extensive knowledge and expertise the police have in this relatively arcane branch of policing.

The evidence proper normally takes a more conventional form, comprising witness statements from the police and less frequently, members of the public, CCTV footage, RAP videos, traces of the locations of defendants’ phones and the times they were used, recordings of ‘phone conversations, if authorised by a magistrate, downloads of texts and photographs from the defendants’ phones’, guns, knives and drugs, and the observations of local beat officers or PCSOs working in gang-

affected neighbourhoods.

Obviously, these submissions are designed to build a case, not undermine it, and so they tend not to address the complexities of the relationships between those young people within gang affected neighbourhoods who are heavily involved in gang activity and those who are peripherally or sporadically involved, not infrequently as a means of self-protection or as a result of implicit or explicit coercion. Nor do they address the subtleties of relationships between these young people and their siblings, friends and associates who are uninvolved in gang-related illegalities.

The evidence provided by most UK and North American studies shows that young people living in gang-affected neighbourhoods are likely to know, to have grown up alongside, to have attended the same schools and to associate with young people affiliated with local gangs. (Hagedorn, 1998, Youth Justice Board, 2007; Klein, 2008; Pitts, 2008; Centre for Social Justice, 2009; Andell and Pitts, 2010; Beckett et al, 2013; Harding, 2013). This close association between ‘*gang affiliates*’ and other young people in gang affected neighbourhoods inevitably creates difficulties for the police and prosecutors; partly because gang involvement can be fluid and sporadic, but also because distinguishing between young people who associate with gang members and those who are ‘gang affiliated’ and engage in gang-related crime is no easy task.

In London, ‘Gang Nominals’, as the police describe those they suspect of gang involvement, are placed on a borough-specific *Gangs Matrix*. Inclusion on the matrix is based upon arrest and conviction data and corroborated and uncorroborated intelligence data, as well as material from *YouTube* and other social networking sites, CCTV footage and telephone traces. However, as the police acknowledge, identifying gang nominals is not a precise science because the Matrix captures both active gang members and their non-offending associates and siblings who are on the system by dint of their proximity to, and frequency of association with gang members, rather than crimes they have perpetrated.

This research, and the experience of professionals working in gang-affected neighbourhoods also suggests that from time to time, young people in gang-affected neighbourhoods who are unaffiliated with the gangs, may be subject to pressure to undertake illegal acts, such as holding or transporting illicit drugs and hiding weapons or the proceeds of drug sales (Pitts, 2008; Beckett et al, 2013).

Thus the language we use to describe gang involvement raises as many questions as it answers. Suspects are described variously and often interchangeably, by prosecutors as: *Associated*, *Involved*, *Wannabees*, *Affiliated* and *Members*. But these descriptors, as the taxonomy I posit below indicates, can mean very different things.

	A Taxonomy of Descriptors of Gang Involvement
Gang Associated	Interacting socially with gang members by dint of propinquity, shared hobbies or pastimes, friendships or familial links (not necessarily illegal).
Gang Involved I	Not being a constituent member of a gang or group or necessarily subscribing to its norms and values but intermittently participating in some of its illegal activities.
Gang Involved II	Not being a constituent member of a gang or group or necessarily subscribing to its norms and values but coerced into undertaking illegal activities on its behalf.
Wannabees	Aspirants, who while subscribing to the gang's norms and values and adopting its dress code, signs and symbols, have not been accepted into the gang and are not involved in its illegal activities.
Gang Affiliated	A constituent, lower status, member of a gang or group; subscribing to its norms and values and participating, as a 'footsoldier', sometimes known as a 'younger', in its illegal activities.
Gang Member	Core member with high status in a gang or group, subscribing to its norms and values and orchestrating, though not necessarily participating in all of, its illegal activities.

Unless the diverse but distinctive patterns of association between young people that characterise gang-affected neighbourhoods is understood (Pitts, 2008; Harding, 2013) and a vocabulary which can reflect this diversity is developed, the doctrine of *Joint Enterprise* is likely to remain a source of injustice.

Gang Association

Many young people will associate with gang members because of the involvement of siblings, relatives or associates with whom they have grown up and/or attended school. This close association between gang-involved and non-gang-involved children and young people was evident in interviews undertaken in recent research on sexual victimisation in gangs on six sites in England (Beckett, et al, 2013). In this research it became clear that gang 'association' is not the same thing as gang 'membership'.

In a recent case, the prosecution identified 7 alleged ‘gang members’ as associates of a subsequently acquitted, defendant. The defendant, aged 17, accepted that he associated with some of these individuals but claimed that his relationship with them did not involve any gang activity:

Associate A, aged around 28, was a neighbour. The defendant had been on ‘nodding terms’ with him for 18 months, since he had moved onto the estate.

Associate B, was a friend of the defendant’s younger brother who sometimes accompanied him to a recording studio where they recorded musical compositions.

Associate C, and the defendant were friends. They had known each other since they were five years old and had grown up together on the estate.

Associate D, was a local Rap artist with whom the defendant sometimes collaborated.

Associate E, was the son of his mother’s closest friend and a neighbour.

Associate G, was unknown to the defendant.

Associate I, played football in the same Sunday Morning League team as the defendant and lived on his estate.

It is almost certainly the case that some of these associates were, or had been, involved in gang-related offending, but they were also footballers, musicians, long-standing friends and neighbours of the defendant. The reality is that in gang-affected neighbourhoods, gang-involved and non-gang-involved children and young people live side by side and lead overlapping social lives, and like other adolescents, their patterns of association are determined to a large extent by propinquity and shared interests.

Gang Involvement I

‘Strategic positioning’ by young people in gang-affected neighbourhoods, to keep themselves safe, was one of the main findings of research I undertook in Waltham Forest, Lambeth and Lewisham (Pitts, 2007; 2008; Youth Justice Board 2007; Centre for Social Justice, 2009).

The idea of Involuntary Affiliation describes most accurately the bind in which increasing numbers of young people in the poorest neighbourhoods in Britain find themselves. It offers a more coherent explanation of their criminal motivation, and the evolution of their criminal careers in this dangerous world awash with drugs, money and firearms, than the accounts offered by much contemporary criminology and the law.

The law, locked into the individualising, volitional, imperative, cannot easily deal with a world characterised by cultures of conflict, coercion and control and involuntary affiliation. Its solution, Joint Enterprise, is simple but effective; everybody becomes equally culpable. (Pitts, 2008)

For many young people in gang affected neighbourhoods, involvement with gang members is essentially pragmatic, a means of securing some degree of safety in a high-risk situation and this may, from time to time, require them to break the law. My research revealed that as the gangs grew larger in the first decade of the 21st century, and territorial disputes intensified, the numbers of protagonists increased and it was no longer easy for anyone to distinguish who, on any given estate, was or wasn't a gang member (Pitts, 2007; Matthews and Pitts, 2007). This meant that, in effect, residence became synonymous with affiliation in the eyes of members of rival gangs and young people with no prior gang involvement were restricted to their own estates because of the threat posed to them.

One of the consequences of the siege mentality that this engendered is that many perfectly innocent young people will appear in *YouTube* Rap videos, partly because there is not much else to do, partly because most of the young people in that age group are 'into' the music and partly because it is strategically important to indicate to gang affiliates and gang members that you are well disposed towards them. The fact that one's appearance on these videos may subsequently be used by the prosecution to demonstrate gang involvement, affiliation or membership, seldom occurs to most of the young participants.

The prosecution in these cases normally cites the content of these videos as evidence of the willingness and ability of the assembled rappers, most of whom do not actually sing but content themselves with bopping up and down and making gang signs with their fingers, to commit the offences for which they are being prosecuted.

However, much North American research suggests that 'myth making' and the creation of a tradition, in which key gang members are lionised and their escapades and achievements exaggerated, is a central activity of youth gangs (Klein, 2008). This is why Rap music, and its mediation via *YouTube* and social networking sites has become a central activity for many UK youth gangs. Indeed, research undertaken in West Yorkshire revealed 'gangs' that did nothing but generate *YouTube* raps about wholly mythical events and achievements (Andell and Pitts, 2010). The ability to write and rap about gang activity is therefore highly valued by gang associates but the audience for these musical offerings is far larger than this. In reality, Gangsta Rap is a significant strand in contemporary mainstream youth culture.

Paul Lester writing in the *Guardian* about the successful UK rap artist Sneakbo (Agassi Odusina), in May 2012 notes that:

Drake (a famous US rapper) loves Sneakbo, and that's good enough reason for us to feature him here, because we love Drake. In fact, Drake loves Sneakbo – a 19-year-old rapper from Brixton in south London – so much that he spent a large proportion of a recent interview singing his praises; five minutes at least, which – considering you only usually get 20 or so

with the American superstar – either suggests the interviewer is mad, or Drake really, really does love Sneakbo ...

So who is this Sneakbo character? Apparently, or so we've been told, he's more Giggs than Tinchy, more 'road' than 'pop'. Although he's not altogether unpopular: he's had more than 20m YouTube channel views. We know YouTube views rarely translate into actual CD sales or downloads, or at least not in the same numbers, but you must admit, 20m – that's pretty big ...

His mixtape I'm Buzzin' was downloaded 5,000 times in a day and his debut single The Wave just scraped the top 40 last autumn ... with his follow-up single, Sing for Tomorrow, which has just been added to the Radio 1 playlist as he gears up to go into the studio with Jessie J and Roll Deep's people for his debut album, tentatively titled Sneak to Da Bo.

When *Sneakbo* first attracted a mainstream following he was paid in the region of £2,000 for a public appearance, plus royalties from album sales and radio plays. Latterly he has been able to command between £15,000 and £20,000 for his appearances at venues like the O2.

Like *So Solid Crew* before him, *Sneakbo* owes his popularity to the fact that he is associated with the notorious Lambeth GAS (Guns and Shanks) gang. Indeed, the twitter responses from *Sneakbo*'s fans stress how 'real' and gritty' his music is and it appears that fans of Rap are looking for this 'effect'. Many of the themes and much of the terminology used in UK Gangsta Rap derive directly from those employed by North American rappers like *Rich Ross*, *50 Cent*, *Little Wayne* and, latterly, *Drake*.

50 Cent "Shootin' Guns"

*Got my guns and magazines ending up in front of me
nothing is quite as it seems, fuck with me and you going to see
shoot your gun now make you a believer
now you better pray for something more*

In a recent case, the prosecution presented rap videos featuring several defendants in which the lyrics spoke of 'taking out' the opposition with 'automatics' etc. In fact, this group had never previously been known to own or use firearms and although they were being prosecuted for a murder, the fatal blow was struck by an umbrella stem.

Gang Involvement II

It is not uncommon for gang affiliates or gang members to induce younger children and young people, sometimes young 'girlfriends', who are not necessarily involved in gangs and are unknown to the police, to hold, hide or transport drugs money or firearms for them. They do this to avoid

apprehension and the associated risk of imprisonment. The children and young people involved may do this out of a misplaced sense of loyalty to the gang, an ill-judged desire to share in the glamour of gang life or, not infrequently, because they are subject to duress (Andell and Pitts, 2013).

Black's Law Dictionary (1990) defines duress as:

any unlawful threat or coercion used ... to induce another to act [or not act] in a manner [they] otherwise would not [or would].

Thus the defendant admits to breaking the law, but claims that they are not liable because, they did so as a result of extreme unlawful pressure.

However, a person cannot rely on the defence of duress if they have voluntarily exposed themselves to the risk of duress by joining a criminal organisation or gang. In the case of *R v Sharp* [1987] 1 QB 353 Lord Lane CJ ruled (at p. 861) that:

... where a person has voluntarily, and with knowledge of its nature, joined a criminal organisation or gang which he knew might bring pressure on him to commit an offence and was an active member when he was put under such pressure, he cannot avail himself of the defence of duress.

Once again we confront the problem of defining gang 'membership' in a social milieu in which relationships transcend the boundaries between gang association, gang involvement and gang affiliation.

In a recent case, a young man with no previous convictions and an exemplary school and college record was charged with possessing a firearm with intent to endanger life. The defendant said he was forced to hide the gun because of threats from gang members on his estate that they would attack his parents and sexually assault his sister. He refused to name the people who threatened him, he said, because he knew what they were capable of, and that the police would be unable to protect him or his family if he did name them. When his house was raided, letters from imprisoned gang members were found. The defendant claimed that these two people were school friends and that he was writing to them to 'cheer them up'. The prosecution argued that the presence of these letters demonstrated the defendant's prior gang involvement and that, as a result he could not invoke a defence of duress because he must have known that at some future point members of this gang *might bring pressure on him to commit an offence*. However, if we follow that logic, the defendant would have had to have known about his friend's future gang involvement when he was in infant school, because that was where the friendship group, some of whose members eventually became gang-involved, first got together.

In cases where the defendant is claiming duress, it is incumbent upon them to specify where, when and by whom such threats were uttered. However, if a child or young person living in a gang-affected neighbourhood is asked by particular people to carry a bag or parcel from A to B or to hide it at home, they know they cannot say 'no'. Moreover, if no explicit threat is uttered; they are unwilling to identify those whom they believe promulgated the implicit threat, and if they have associated with them in the past, particularly if this was recorded on a *YouTube* video or a photograph on their mobile phone, a plea of duress is unlikely to hold up.

Wannabees

Wannabees are young people, normally found in loosely structured groups who engage in spontaneous social activity and sometimes exciting, impulsive, criminal activity including collective violence against other groups. They tend to hover on the fringes of real gangs and although they may assume the trappings of street gangs, insignia, colours and street names, and lay claim to territory, they are essentially aspirants, eager to gain acceptance and eventual inclusion in a real gang. In a study undertaken in West Yorkshire (Andell and Pitts, 2010), the researchers unearthed the *187 crew*. This group wore T-shirts with a 187 motif (187 is US police code for a drive-by shooting) but they had no known criminal involvement. However, these sorts of trappings of gang membership are frequently cited by the prosecution as evidence of gang membership and of previous bad character (see below) and this puts young Wannabees at risk of being drawn into the legal process.

Gang Affiliated

A relatively low status affiliate of the gang, a 'younger', who is unlikely to initiate or orchestrate gang activity but will participate willingly in it.

Gang Membership

A relatively high status affiliate of the gang, an 'elder' or 'older' who is likely to initiate or orchestrate gang activity but may rely on other, lower status, gang affiliates or gang associates to undertake it.

Bad Character, Bad Judgement or Bad Luck?

The *Criminal Justice Act* (2003) changed the rules governing the admissibility of evidence relating to the character of defendants. The Act allows previous convictions and evidence of 'untruthfulness' and 'reprehensible behaviour', unrelated to the case in hand, to be put before a jury. This can include evidence relating to charges on which the defendant was acquitted. In the case of gang-related offences the prosecution may cite Rap Videos and photographs taken from the defendant's

phone as well as previous arrests. As we have already noted, while appearance in a Rap video may show gang association they are not necessarily an indication of gang involvement, gang affiliation or gang membership and, unless the content is defamatory or an affront to public decency, it is not illegal either. Nor are pictures of young men making gang signs with their fingers taken on their telephones and downloads of pictures of rap stars or recordings of their music. Pictures of the defendant holding a gun or a large bag of illicit drugs is pretty solid evidence, but pictures of bottles of expensive Cognac, Brandy and Champagne and large wads of banknotes, popular amongst gang-involved young people, may testify to their aspirations but not to their culpability,

In a recent case a police witness wishing to demonstrate ‘the defendant’s previous bad character to the jury noted that Mr X was *no stranger to arrest*. What he failed to mention was that Mr X, while no stranger to arrest, had never in fact been charged for any of the alleged offences for which he had been arrested, had never been the subject of a ‘*No Further Action*’, decision by the police, and had never been prosecuted by the Crown Prosecution Service. The five arrests cited all occurred some time after an offence which was believed to have been perpetrated by members of the gang that was active on the estate where Mr X lived; some of whose members Mr X associated with. On each occasion Mr X spent less than one hour in the police station. He believed that he was regarded by the police as a ‘wrong-un’ because of his long lasting friendship with a member of the aforementioned gang. Once again, a failure to understand the complex patterns of association amongst young people living in gang-affected neighbourhoods meant that this young man had been placed on the Metropolitan Police Gangs Matrix and had thereby become one of the ‘usual suspects’.

Few of the defence solicitors and barristers in these cases have firsthand knowledge of the complex patterns of association in gang-affected neighbourhoods, and their young clients are unlikely to volunteer this information. If it is to be introduced into these trials at all, it will have to come from the youth workers and workers in gang-desistance programmes who know the young people and the neighbourhoods they inhabit. The interests of the young people, as well as those of the justice system, would be better served if these workers were to establish a dialogue with the lawyers in local criminal law practices, via the local branches of the Law Society, in order to brief them on the peculiarities of the social worlds in which their young clients are enmeshed.

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