

Anna Young, Chair
On behalf of the Committee on Juvenile Courts
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**IN THE SUPREME COURT
STATE OF ARIZONA**

In the matter of:)	
)	
PETITION TO AMEND R. PRO.)	Supreme Court No. R-25-0054
JV. CT. 214)	
)	COMMENT OF THE
)	COMMITTEE ON JUVENILE
)	COURTS
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Pursuant to Rule 28(c), Rules of the Supreme Court of Arizona and this Court’s order dated January 22, 2026, the Committee on Juvenile Courts (COJC) hereby submits this Comment regarding Rule Petition No. R-25-0054 (“Petition”), a joint petition filed by the Directors of the Maricopa County Indigent Defense Agencies. The Petition proposes amending Rule 214 of the Rules of Procedure for the Juvenile Court to incorporate Criminal Rule 39 (“victims’ rights”), but requiring the State to make required notifications in 10 days rather than 30 days.

Following discussion of this Petition at the April 23 2026, COJC meeting, a motion was made and seconded that the COJC file this Comment opposing Rule Change Petition No. R-25-0054. The motion was unanimous. This Comment is a

result of that formal Committee action and is intended to reflect the COJC's discussion and recommendations on the amendments requested in the Petition.

I. Discussion

A. Incorporation by Reference is Problematic

For the same reasons stated in the COJC's Comment to Rule Petition R-25-0052, incorporation of criminal rules into the Juvenile Rules is problematic. The terminology used throughout the juvenile statutory and rule framework is deliberate and is distinct from terminology used in adult criminal cases. For example, juveniles are referred to as "juveniles," not "defendants," and juveniles may be "adjudicated delinquent," rather than "convicted."

The Juvenile Rules sparingly incorporate rules from other rules sets, and even then, the incorporated language has been carefully adapted so that the language from the incorporated rule aligns with juvenile-specific terminology. For example, Juvenile Rule 329(b) incorporates Civil Rules 4(f), 4.1, and 4.2 by reference but only after modifying them so that they operate properly in the context of the Juvenile Rules.

Incorporating Criminal Rule 39 "as is" would disrupt the coherence of the juvenile framework because it would import terminology applicable to adult criminal cases into the Juvenile Rules, risking confusion and inconsistency. And while the COJC agrees that changing the timeframe to require the State to make

notifications in 10 days rather than 30 days is reasonable, without a rule specifically tailored to juvenile proceedings, the COJC has no vehicle by which to provide feedback or express support for the proposed timeframe.

B. Proposed Rules Should be Tailored to Juvenile Matters

If aspects of criminal rules are helpful in juvenile proceedings, they are best implemented through juvenile-specific rules tailored to fit the existing Juvenile Rules framework, rather than through incorporating criminal rules by reference. Rather than revising the proposal in the current Petition, and to allow for a meaningful public comment period on a proposal drafted in that manner, the COJC recommends that this Court deny the Petition and allow Petitioners to bring forward a tailored proposal in the next rules cycle.

II. Conclusion

For the reasons stated above, the COJC opposes the Petition and respectfully requests that this Court deny it. This will allow Petitioners to submit a juvenile-tailored proposal during the 2027 rules cycle, where it can be properly evaluated during the public comment period.

Respectfully submitted this 28th day of April, 2026.

/s/ Anna Young
Anna Young, Chair
On behalf of the Committee on Juvenile Courts