

*Victim-Offender Mediation: A Restorative Justice Model*

**I. Introduction**

Increases in youth crime have placed a considerable strain on both the criminal justice and juvenile justice systems. Juvenile delinquency is a serious social problem with great financial and social costs. It also has significant negative emotional, physical, and financial effects on victims, their families, and communities (Bradshaw, et. al). In response to mounting caseloads and diminishing resources, some experts suggest that a restorative justice model, is necessary for combating crime and its impact on victims, juveniles, and the community (Arrigo & Schehr, 1998). The development of effective programs and interventions to reduce juvenile recidivism is a national priority. Historically, there has been little evidence for the success of these methods in reducing recidivism.

With its focus on interpersonal relationships, human need, and collaborative problem-solving processes, restorative justice might be viewed as a peacemaking or conflict-resolution approach to justice (Zehr 2004). In this philosophy, a crime is viewed as an offense against a victim, and the emphasis on resolving conflict, repairing harm to the victim, holding the offender accountable to the victim, and returning things as much as possible to the way they were before the offense occurred.

## **II. Mediation**

The goal of mediation is to create an environment which allows the parties to engage in a dialogue in which emotional and informational needs are met and in which a plan for the offender “to make things right,” as much as possible, is developed. It involves victim and offender meeting and talking about the crime, and coming to an agreement as to how the offender is to make amends to the victim in some way.

The meeting and the dialogue between the parties takes place with the assistance of a neutral mediator, who plays a passive role during the mediation process. The idea is that in the course of the mediation session, the offender will come to realize what he has done as the victim describes for the perpetrator the injuries and/or other consequences that the crime has involved for the victim. The mediation session is regarded as being different from courtroom proceedings in both form and content. During trial, the parties are represented by professional lawyers who plead their case instead of the parties themselves talking directly to one another. However, in mediation the perpetrator, but perhaps primarily the victim, is conceived as being transformed into an active participant instead of assuming the passive role they are assigned during a formal trial (Rytterbro, 2003).

Mediation has long been viewed as an alternative form of dispute resolution. Victim-offender mediation (VOM), a process which allows crime victims to meet face-to-face with the offender to talk about the impact of the crime and to develop a restitution plan, which is the oldest and most empirically grounded restorative justice intervention (Umbreit, 1998). Understanding how to respond effectively and efficiently to crime victims and their offenders,

and identifying what policies assist victims in having their victimization redressed is a major social concern.

The impact of mediation in resolving a wide range of interpersonal conflicts is well documented. The application of mediation consistently results in high levels of client satisfaction and perceptions of fairness within families among co-offenders, in neighborhoods and schools, and the criminal justice system. An important outcome in mediation is a written, mutually agreed upon settlement between the involved parties. Some conflicts require a primary focus on reaching an acceptable settlement, most conflicts develop within a larger emotional and relational context characterized by powerful feelings of disrespect, betrayal, and abuse. Through recognition, the parties in conflict voluntarily choose to become more open, attentive, and responsive to the situation of another, thereby expanding their perspective to include an appreciation for the circumstances that the other person is faced with. Whether an actual settlement occurs is secondary to the process of transformation and healing that occurs in their relationship.

### **III. Restorative Justice**

Important societal benefits may become possible: The most fully restorative mediation programs will maximize social capital and promote a civic culture by affirming popular support for public decisions by bringing the community more fully into the case management and decision-making process. The role of the mediator is to facilitate and coordinate this process (Harrison, 2002). Victims are not regularly informed of the outcome of the trial, unless they are present as witnesses; in which case, court attendance remains frequently inconvenient, and the practice of “putting the victim on trial.” There has been a great upsurge of interest in victim-

offender mediation as an alternative to punishment as the outcome of the criminal process. The criminal process remains adversarial, there are fears that victim's statements may lead to more punitive sentencing which could be described as "more of the same." (Wright)

Courts and restorative justice programs do not deal with the same types of situations. Restorative justice programs typically require that the offender plead guilty before the case can be dealt with restoratively; should the accused contest the charges against him or her, the case must go to court. Restorative programs deal only with sanctioning, whereas courts deal with both adjudication and sanctioning (Wemmers & Cyr).

The practice of VOM is grounded in the principles of restorative justice model. Crime is a violation of people and relationships, which creates obligations to make things right. Justice involves the victim, the offender, and the community in a search for solutions which promote, repair, reconciliation, and reassurance. VOM involves the use of trained mediators to facilitate restoration to the victim and the reintegration of the offender into the community. It is important to note that VOM is only one of a number of victim-offender encounter models being used in the restorative justice field today.

Restorative justice seeks to reframe the way we conventionally think about wrongdoing and justice away from our preoccupation with law breaking, guilt, and punishment toward a focus on harms, needs, and obligations. Restorative justice especially emphasizes the importance of the engagement and empowerment of those most affected by wrongdoing and the use of problem-solving approaches. Restorative justice reflects three basic assumptions: (1) crime is a violation of people and relationships, (2) violations create obligations, and (3) the central obligation is to put right the wrongs (Zehr 2000). According to Zehr (2004) restorative justice calls one to:

- Focus on the harms and consequent needs of the victims, as well as those of the communities and the offenders.
- Address the obligations that result from those harms.
- Use inclusive, collaborative processes to the extent possible.
- Involve those with a legitimate stake in the situation, including victims, offenders, community members and society.
- Seek to put right the wrongs.

Restorative justice practices actively involve parties to a crime in repairing harm and building communities. The primary foci of restorative justice are harm and repair of harm, as opposed to those of the traditional criminal justice system, lawbreaking and punishment. Currently, the United States has the highest per capita incarceration rate in the world. They may address a crime that has been perpetrated or they may be designed to prevent crime, as are antibullying programs. Braithwaite (1999) offers 13 propositions which exhaust the possible bads of restorative justice, which are:

1. Restorative justice practices might provide no benefits to most victims;
2. Restorative justice practices might not reduce the crime rate;
3. Restorative justice practices can increase victim fears of revictimization;
4. Restorative justice practices may merely exploit victims in order to rehabilitate offenders;
5. Restorative justice practices, through excess shaming, may stigmatize offenders;
6. Restorative justice practices may not work in industrialized societies which lack community as envisioned in restorative justice writings;

7. Restorative justice practices may oppress minority offenders by removing state protections;
8. Restorative justice practices may result in net widening, leading to greater numbers of people under formal or informal control;
9. Restorative justice practices may not redress structural injustices;
10. Restorative justice practices may exacerbate the oppression of socially subordinate groups by silencing them or treating them harshly;
11. Restorative justice practices may be prone to capture by socially dominant participants;
12. If police facilitate, restorative justice practices may grant them too much power;
13. Restorative justice practices may infringe upon individual rights because protections are not well articulated (Braithwaite, 1999).

Victims' experiences in the justice system may help or hinder their healing process.

Restorative justice aims to heal the suffering caused by victimization. However, some victim advocates have expressed concern that restorative justice may hinder victims' healing process.

Victims have been described as the "forgotten party" in the criminal justice system. In the criminal justice, victims are considered to be witnesses to a crime committed against the state; the criminal justice process is centered on the crime, and victims' suffering is secondary. Since the 1980s, victimologists have recognized the risk of secondary victimization within the criminal justice system (Wemmers & Cyr, 2005).

Restorative justice programs such as victim-offender mediation, which brings together victims and their offenders in an effort to reach an agreement about how to deal with the offence, gives victims an opportunity to participate in the criminal justice process. Because it provides

the victim with a sense of participation and control over his or her life, mediation may be therapeutic for crime victims (Wemmers & Cyr, 2005).

VOM allowed some victims to nurture, forgive, and/or speak up for themselves. Then, the session was a sort of performative that, arguably, helped combat feelings of powerlessness after a crime. Similarly, for offenders, VOM was a vehicle, albeit an imperfect one, for being good and responsible now. Research suggests that constructing oneself as redeemed might conduce to desistance (Maruna, 2001). One of the objective of restorative justice, is to exert social control over the offender. In seeking to control wrongdoers, restorative justice is similar to other responses by the criminal justice system, except that the putatively preferred control mechanisms are informal and discursive (Presser & Hamilton, 2006 ).

#### **IV. Victim-Offender Mediation**

The restorative justice practice of VOM, began in the late 1970s. The practice of VOM was fully endorsed by the American Bar Association in the summer of 1994 and its implementation was recommended in courts throughout the country (Umbreit, 2001). VOM programs bring together victims of crime and their convicted offenders for discussion with the assistance of trained mediators. VOM is the most established intervention model of the restorative justice movement, which more than thirteen hundred VOM programs in eighteen counties. The practice of VOM is grounded in restorative justice theory that emphasizes that crime should first be perceived as an act against individuals within the context of community. While not denying that the state clearly has an interest in preventing and resolving criminal conflict, restorative justice offers a process by which those most directly affected by crime, the victim, the community, and the offender; have an opportunity to be involved directly in responding to the offense, holding

the offender accountable, offering emotional and material assistance to the victim, and working toward the development of a safe and caring community for victim and offender (Bradshaw, et. al, 1998).

The heart of VOM is a guided face-to-face meeting between a crime victim and the person or persons who victimized them, following premediation preparation of each party. The goal of these meetings is to provide a safe place for genuine dialogue between the involved parties that can address emotional and informational needs, and perpetrators of juvenile property offenses and minor assaults. Some programs have expanded the focus of VOM and provide mediated dialogue for crimes of service violence. (Bradshaw, et. al)

Generally there are two types of mediation: direct and indirect. Direct mediation involves a face-to-face meeting between victim and offender; this meeting is facilitated by one or more mediators. Indirect mediation does not involve face-to-face contact. Instead, the mediator acts as a go-between, talking with each party separately. Indirect mediation is less common in North America than direct mediation, but it can be useful, particularly when, for any reason, the victim does not want to meet the offender (Wemmers & Cyr).

Providing opportunities for certain victims of crimes and their offenders to meet face-to-face to talk about the crime, to express their concerns, and to work out a restitution plan is now occurring in a growing number of communities. It is clear that the process of mediating victim-offender conflict is moving toward the mainstream of justice in a growing number of communities while still remaining fairly marginal to the justice system in many other communities (Greenwood).

## **V. Texas Victim Offender Mediation**

The Texas Victim Offender Mediation/Dialogue (VOMD) program is a unique initiative to bring victims of severe crime and their convicted offenders together for a daylong dialogue session. Often victim and offender have not seen each other since the offender's appearance in court, if at all. While mediators in the program may take an active role in preparing participants to meet, the actual mediation is best characterized as immediate dialogue between the victim and offender (Szmania).

VOMD programs are administered by the Texas Department of Criminal Justice and is housed in the Division of Victim Services. VOMD was established in 1993 and facilitated its first case in 1995. Once the victim requests a VOMD session, the offender is contacted by program staff. The offender's participation is voluntary and has no impact on the offender's prison sentence or parole (Szmania, 2006). The programs are designed using both therapeutic and humanistic styles of mediation. A therapeutic model of mediation incorporates premediation work through grief inventories that are aimed at assessment of participants' motivations, needs, and goals (Szmania, 2006). Humanistic mediation centers on the belief in the connectedness of all things and our common humanity. The goal of humanistic mediation is to promote understanding between participants.

According to Szmania, victims and offenders in the Texas VOMD program report that they are extremely satisfied with their participation in the program, and many indicate that their mediator was a major factor in their positive evaluation of the process. This satisfaction occurs in part from the mediators' abilities to engage victims and offenders in dialogue from the very first moments of their face-to-face meetings (Szmania, 2006).

## **VI. Purpose of VOM**

The purpose of giving crime victims the opportunity to meet face-to-face with their offenders is to “right the wrong.” Although the offender is held accountable, it is the actions and behaviors of the offender that is the focus of the meeting, not the individual. Victims can meet with their offenders and demand reparations while learning that the offender is human. Similarly the offender has the opportunity to see the victim also as a human, and to learn how the offense affected the victim and their family. Openness and dialogue with the offender is one of the most important reasons for the victim to participate in VOM. After discussing why and how the crime took place and the effects of the crime, then the parties discuss how to repair the damage. Reparation is usually done through the formal method of a contract and can include anything that the parties agree upon such as an apology, financial restitution, community work, or rehabilitation. The contract can be creative and is individually tailored to the needs of the victim and offender. Thus, both parties win and both are able to keep their dignity (Williams-Hayes et. al, 2004).

## **VII. Process of VOM**

Victim offender mediation programs work in a number of ways. Most offer the opportunity for face-to-face dialogue between victims and offenders who want to participate. In cases involving severe crime where the victim has been killed, the victim’s family members may choose to initiate the mediation process after the offender’s trial and conviction. Offenders typically do not receive leniency or parole consideration for their participation in victim offender mediation. Some offenders may be diverted to mediation programs before they are sentenced for their crimes while other offenders may participate long after they have begun serving time.

Crimes mediated in victim offender mediation programs range from property crime to severely violent crime, including homicide. Most of what is known about victim offender mediation comes from the need to create and develop victim offender mediation programs that meet specific community needs (Szmania, 2006).

VOM programs receive referrals from services. Some referrals are given after a formal admission of guilt in court by the offender, and other referrals take place before as a diversionary practice (Umbreit, 1994). Thus, VOM can be diversionary or part of the adjudication process. During the process offenders are encouraged to understand the human impact of their offenses and to take responsibility for their actions. While victims are encouraged to express their feelings and ask any questions that they may have about the incident. The ultimate goal of VOM is for the parties to work together to construct a restorative agreement. These agreements may include restitution, some form of service on the part of the offender, or simply an apology, but the details of the agreement are always decided by the parties in each case (Zehr, 2004).

Victim-offender mediation began formally in 1974 (Williams-Hayes et. al, 2004). The mediator meets with both the offender and the victim beforehand to hear their story and to determine if the case is appropriate for mediation. Then, a trained mediator facilitates the process of reconciliation and restoration through dialogue and negotiation (Umbreit, 1989). Usually, participants are limited to the victim, the offender and his parent(s) if applicable. If parents are present they are often observers (Williams-Hayes et. al).

### **VIII. Effectiveness**

According to Nugent, about 87% of VOM sessions result in a restitution agreement (Nugent). The amount of restitution requested by the victim is usually higher than that asked by the judges

(Eve & Cushman, 2000). Regardless of the amount requested, restitution agreed upon through VOM is completed more often than when restitution is ordered through the court (Umbreit, 1994).

Nugent and Paddock (1995) found lower recidivism among VOM participants and for those that did offend again the severity of the offense was lower than for non-VOM participants. Schneider (1986) also found significantly reduced recidivism for a group of felony offenders who participated in VOM versus those who went through probation (Zehr, 2004). Critics of VOM have expressed concern about the potential for revictimization during the meeting between the parties. Although fear of revictimization is certainly a concern and reconciliation may not be a priority for all victims, the amount of voluntary victim participation in VOM that has already occurred suggests that victim fear and anxiety does not always preclude facing offenders (Zehr, 2004).

Two factors that have been proposed as predictors of victim participation are the type of offense and the amount of time that has elapsed between the offense and the mediation. Peachey (1989), suggests that victims seek different responses to crime based on the nature of the offense. When the offense involves property damage or loss, compensation is preferred and mediation is more viable; when the offense involves personal injury or violence, retribution is preferred. Reeves (1989), suggests that victims may feel fear and anger soon after an offense but as time passes they may wish to “come to terms” with the offender. That is, victims of crime progress through stages of coping that frequently include anger and fear at the outset but may develop into a desire to make contact with the offender at a later point. Willingness to participate in mediation may be a function of the amount of time that has elapsed since the offense. However,

the length of time required to pass through stages of coping may vary with the type of offense (Reeves, 1989).

Reeves (1989), found that those who chose to participate indicated a high level of curiosity and desire to know why the offender committed the act. These victims also indicated an interest in letting the offenders know the impact of their actions. Various studies suggest that victims participate to recover their losses, help the offender, teach the offender a lesson about accountability, and participate meaningfully in the criminal justice process (Wyrick & Costanzo, 1999). Reasons provided by victims who chose not to participate have included the fear of meeting the offender and the feeling that there would be no useful purpose served (Reeves 1989).

Gehm (1990), found that victims were more likely to participate when the offender was white. The results of the study conducted by Wyrick and Costanzo (1999), diverge from Gehm's in that cases involving white offenders were no more likely to reach mediation than were those that involved Hispanic offenders. However, cases involving White offenders were significantly more likely to reach mediation than those involving non-Hispanic minority offenders. These findings indicate some level of conscious or unconscious discrimination on the part of victims when choosing whether to participate in VOM. If such discrimination is taking place, the differences between the findings may be attributable to the ethnic composition of the regions in which the studies were conducted (Wyrick & Costanzo, 1999).

The results show that victim support workers are skeptical of restorative justice programs and reluctant to refer victims to them. Their main concern was the risk of secondary victimization, or augmenting the post-traumatic stress suffered by the victim as a result of the crime. They emphasized the need to protect victims from further suffering rather than to expose them to

greater risks. These differing views raise the question of whether restorative justice helps or hinders victims' recovery (Wemmers & Cyr, 2005).

Studies of victim-offender mediations have shown that between 50 percent and 80 percent of those who are referred to victim-offender mediation agree to participate (Wyrick & Costanzo). With respect to the healing effects of victim-offender mediation, Umbreit (1994) reports that 90% of victims who participated in mediation were satisfied with the outcome of the mediation process. Based on a comparison to pre-mediation data, the victims in Umbreit's study were less upset about the crime after the mediation session than before. Victims were also less often afraid of being re-victimized by the offender after the mediation session (Wemmers & Cyr, 2005).

Johanne Blanchette (1996) compared victim satisfaction with different alternative sanctions in Quebec. She found that victims who participated in mediation were more often satisfied that justice had been rendered in their case than victims whose offenders received community service or another non-restorative alternative sanction. Similarly, victims who participated in mediation were more often satisfied with the outcome of their case than those whose offenders had been given community service.

## **IX. Conclusion**

Numerous studies have found uniformly high levels of satisfaction with mediation for both victims and offenders. However, Peachey (1989) notes that a major challenge mediators face is getting the disputants to agree to meet for mediation. Umbreit, Coates, and Vos (2001), report in their review of two decades of research that typically 80 to 90 percent of participants report being satisfied with the process and that 90 percent of these meetings resulted in restitution agreements. Results of the logistic regression showed that VOM youth recidivated at a

statistically significant reduced rate, 32 percent lower than non-VOM youth. In addition, when VOM youth did reoffend, they did so for less serious offenses than non-VOM youth did. When considered as a whole, the data regarding reduction of recidivism, the high levels of victim and offender experience of satisfaction and fairness in the VOM process, and high rates of restitution agreement completion supports the use of VOM as an empirically supported intervention for juvenile offenses (Bradshaw, et. al, 1998).

## References

- Abrams, Laura S., Umbreit, Mark, & Gordon, Anne. 2006. *Young Offenders Speak About Meeting Their Victims: Implications for Future Programs*. Contemporary Justice Review, 9(3).
- Arrigo, Bruce A. & Schehr, Robert C. 1998. *Restoring Justice For Juveniles A Critical Analysis of Victim-Offender Mediation*. Justice Quarterly, 15(4), 629-666.
- Braithwaite, John. 1989. *Crime, Shame and Reintegration*. Cambridge, UK: Cambridge University Press.
- Bradshaw, W. & Umbreit, Mark S. 1998. *Crime Victims Meet Juvenile Offenders: Contributing Factors to Victim Satisfaction With Mediation Dialogue*. Juvenile and Family Court Journal, 17-24.
- Drake, Patrick G. 2006. *Victim-Offender Mediation in Texas: When "Eye for Eye" Becomes "Eye to Eye."* 47 South Texas Law Review 647.
- Evje, A. & Cushman, R. C. 2000. *A Summary of the Evaluations of Six California Victim-Offender Reconciliation Programs*. Report to the California Legislature from The Judicial Council of California Council of California, Administrative Office of the Courts, Center for Families, Children & the Courts.
- Gehm, J. 1990. *Mediated Victim-Offender Restitution Agreement: An Exploratory Analysis of Factors Related to Victim Participation: Criminal Justice, Restitution, and Reconciliation*. Monsey, NY: Criminal Justice Press.
- Harrison, Russell S. 2002. *Community-Based Mediation Programs: A Case Study and Comparison*. International Journal of Public Administration, 25(11), 1427-1457.
- Lucas, Nancy. 2001. *Restitution, Rehabilitation, Prevention, and Transformation: Victim-Offender Mediation for First-Time Non-Violent Youthful Offenders*. 29 Hofstra Law Review 1365.
- Maruna, Shadd. 2001. *Making Good: How Ex-Convicts Reform and Rebuild Their Lives*. Washington, DC: American Psychological Association.
- Norris, F. H., Kaniasty, K., & Thompson, M. P. 1997. *The Psychological Consequences of Crime Findings from a Longitudinal Population-Based Study*. Thousand Oaks, California: Sage.
- Nugent, William R., Williams, Mona, Umbreit, Mark S. 2003. *Participation in Victim-Offender Mediation and the Prevalence and Severity of Subsequent Delinquent Behavior: A Meta-Analysis*. Utah Law Review, 137(1), 137-166.

- Nugent, William R. & Paddock, J. B. 1995. *The Effect of Victim-Offender Mediation on Severity of Reoffense*. *Mediation Quarterly*, 12(4), 353-367.
- Peachey, D. E. 1989. *What People Want from Mediation, Mediation Research: The Process and Effectiveness of Third Party Interventions*. San Francisco: Jossey-Bass.
- Presser, Louis. 2006. *The Micropolitics of Victim-Offender Mediation*. *Sociological Inquiry*, 76(3), 316-342.
- Reeves, H. 1989. *The Victim Support Perspective, Mediation & Criminal Justice: Victims, Offenders and Community*. Thousand Oaks, California: Sage.
- Rytterbro, Lise L. 2003. *Victim and Offender Viewed from the Perspective of Mediation*. *Journal of Scandinavian Studies in Criminology and Crime Prevention*, 4, 101-122.
- Schneider, Carl D. 2000. *What It Means to Be Sorry: The Power of Apology in Mediation*. *Mediation Quarterly*, 17(3).
- Schneider, A. L. 1986. *Restitution and Recidivism Rates of Juvenile Offenders: Results from Four Experimental Studies*. *Criminology*, 24(3), 533-552.
- Schneider, Robert C. 2000. *From Restoration to Transformation: Victim-Offender Mediation as Transformation Justice*. *Mediation Quarterly*, 18(2), 265-280.
- Szmania, Susan J. 2006. *Mediators' Communication in Victim Offender Mediation/Dialogue Involving Crimes of Severe Violence: An Analysis of Opening Statements*. *Conflict Resolution Quarterly*, 24(1), 111-127.
- Umbreit, Mark S., Coates, Robert B. & Vos, Betty. 2004. *Victim-Offender Mediation: Three Decades of Practice and Research*. *Conflict Resolution Quarterly*, 22(1-2).
- Umbreit, Mark S. 2001. *The Handbook of Victim Offender Mediation: An /essential Guide to Research and Practice*. San Francisco, CA.
- Umbreit, Mark S., Coates, Robert B. & Vos, Betty. 2001. *Victim-Offender Mediation: Two Decades of Research*. *Federal Probation*, 65(3).
- Umbreit, Mark S. & Greenwood, Jean. 1999. *National Survey of Victim-Offender Mediation Programs in the United States*. *Mediation Quarterly*, 16(3), 235-251.
- Umbreit, Mark S. 1998. *Restorative Justice Through Victim-Offender Mediation: A Multi-Site Assessment*. *Western Criminology Review*, 1(1).
- Umbreit, Mark S. 1997. *Humanistic Mediation: A Transformative Journey of Peacemaking*. University of Minnesota College of Human Ecology.

- Umbreit, Mark S. 1994. *Victim Meets Offender: The Impact of Restorative Justice and Mediation*. Monsey, NY: Criminal Justice Process.
- Umbreit, Mark S. 1989. *Crime Victims Seeking Fairness, Not Revenge: Towards Restorative Justice*. *Federal Probation*, 53(3), 52-57.
- Wemmers, Jo-Anne & Cyr, Katie. 2005. *Can Mediation Be Therapeutic for Crime Victims? An Evaluation of Victims' Experiences in Mediation With Young Offenders*. *Canadian Journal of Criminology and Criminal Justice*, 527-541.
- Williams-Hayes, Mona, Dulmus, Catherine N., Nugent, William R., & Sowers, Karen M. 2004. *Policy Recommendations for the Use of Victim-Offender Mediation to Redress Criminal Actions*. *Journal of Health & Social Policy*, 18(4), 53-69.
- Wright, Martin. 1985. *The Impact of Victim-Offender Mediation on the Victim*. *Victimology: An International Journal*, 10(1-4), 631-644.
- Wyrick, Phelan A., & Costanzo, Mark A. 1999. *Predictors of Client Participation in Victim-Offender Mediation*. *Western Criminology Review*, 16(3), 253-267.
- Zehr, Howard. 2004. *Commentary: Restorative Justice: Beyond Victim-Offender Mediation*. *Conflict Resolution Quarterly*, 22(1-2), 305-315.
- Zehr, Howard. 1995. *Changing Lenses: A New Focus for Crime and Justice*. Scottsdale, PA: Herald Press.