conduct of their children. It was presumed that parents possess a duty to supervise their offspring and that this type of statute would encourage parents to monitor and to control their kids. These strict and vicarious liability statutes were ruled unconstitutional in Connecticut, Louisiana, Oregon, and Wyoming.

Parental responsibility statutes generally hold parents responsible for the failure to take reasonable steps to prevent their children from engaging in serious or persistent criminal behavior. A New York law, for instance, punishes a parent who "fails or refuses to exercise reasonable diligence in the control of . . . a child to prevent him from becoming . . . a 'juvenile delinquent' or a 'person in need of supervision.' . . ." These statutes, as illustrated by the New York law, generally lack clear and definite standards.

There are a variety of laws that hold adults liable for teenage drinking. **Social host liability laws** hold adults liable for providing liquor in their home to minors in the event that an accident or injury occurs. Variants are so-called teen party ordinances, which declare that it is criminal for an adult to host a party for minors at which alcohol is served. Some states impose misdemeanor liability on parents whose children fail to attend school on a regular basis. See *In re Gloria H.*, 979 A.2d 710 (Md. 2009).

In 1993, in *Williams v. Garcetti*, 853 P.2d 507 (Cal. 1993), the California Supreme Court upheld the constitutionality of a California parental responsibility statute. The law stated that a "parent or legal guardian to any person under the age of 18 years shall have the duty to exercise reasonable care, supervision, protection, and control over their minor child." A parent or guardian whose "act or omission causes or tends to cause or encourage a child to violate a curfew, be habitually truant or commit a crime" is held liable under the statute. In other words, parents are held liable who know or should know "that their child is at risk of delinquency and . . . they are able to control the child." A violation of the statute is punished as a misdemeanor, although the charges may be dismissed prior to trial against a parent or guardian who completes an education, treatment, or rehabilitation program. The legislature passed the law as part of an effort to combat "violent street gangs whose members threaten, terrorize, and commit a multitude of crimes against the peaceful citizens of . . . neighborhoods."

The California Supreme Court stressed that the provision for parental diversion from criminal prosecution in "less serious cases" means that parents will face criminal penalties for a "failure to supervise only in those cases in which the parent's culpability is great and the causal connection correspondingly clear." On one hand, it seems unfair to hold parents vicariously liable for the criminal acts of their children. On the other hand, parents would certainly seem to have certain obligations and responsibilities to society based on their decision to have children. Holding parents liable may lead them to closely supervise their children and may serve to protect society. What is your view?