



Marilena David
Director

3031 W. Grand Blvd., Ste. 450, Detroit, MI 48202
(Phone) 313.256.9833 (Client calls) 313.256.9822
(Fax) 313.263.0042 www.sado.org

FY25 Juvenile Lifer Resentencing Appropriations Report

In compliance with Sec. 316 of SB 747, PA 121 of 2024

In FY 2025, SADO's Juvenile Lifer Unit (JLU) operated from an appropriation of \$2,894,200 with a staff of 18.5 employees who were responsible for completing juvenile lifer resentencings under *Miller, Montgomery, Parks, Poole, and Stovall*.

As required by SB 747, JLU staff provided "competent, resourced, and supervised counsel in cases that involve resentencing individuals who are serving a life sentence for an offense committed when the individuals were 18 years of age or younger."

This report is being submitted in compliance with Sec. 316 of SB 747 and encompasses the following data for FY25: the number of cases investigated and prepared by SADO and the hours spent and the incremental costs associated with the investigation and robust examination of each case

A detailed background and history of the development of these facts and figures completed by SADO since 2016 to 2024 can be found in prior JLU appropriation reports located [here](#). This report focuses on 2025 data.

FY25 Juvenile Lifer Unit Litigation Numbers

SADO's JLU represented 10 *Miller/Montgomery* clients in 2025 and closed 2 client cases: Since 2016, SADO's Juvenile Lifer Unit has been representing clients entitled to resentencing under *Miller/Montgomery*. In FY 2025, SADO continued to represent its 10 remaining clients from this group and resolved 2 clients' cases, leaving 8 clients in need of continued representation and case work.

SADO's JLU represented 9 clients in 2025 who are at various stages of appeals from juvenile lifer resentencings: SADO accepts conflict-free appointments to handle certain life without parole appeals as well as appeals from other excessive sentences. In 2025, SADO continued to represent approximately 9 clients appealing juvenile lifer resentencing outcomes, including disproportionate and excessive sentences that violate statutes and the constitution.

SADO's JLU represented 168 *Parks/Poole* clients in 2025 and completed resentencings for 50 clients: SADO began working on *Parks* resentencings in 2023. SADO was appointed to represent 168 clients and began casework and investigations for these cases that continues to date. Resentencings were delayed while prosecutors appealed the court decision. In April 2025, the decision was confirmed to apply retroactively via *Poole*, and the pace of resentencings picked up,

though resentencings were still delayed while prosecutors made final sentencing decisions as required by statute. Despite delays, SADO represented 50 clients at resentencing hearings by the end of 2025, leaving approximately 120 clients with ongoing litigation.

SADO conducted conflict checks for 582 *Czarnecki/Taylor* clients in 2025 and SADO's JLU began representing approximately 75 clients from this group: In April 2025, *Czarnecki/Taylor* entitled 582 additional people in Michigan to resentencing. SADO began the arduous task of conducting initial conflict checks to determine the number of people SADO could represent. By the end of December 2025, SADO was appointed to represent approximately **75** new *Czarnecki/Taylor* clients with dozens of more appointments pending. Private indigent appellate counsel from the Michigan Appellate Assigned Counsel System (MAACS) roster, in which SADO administers, have been appointed to represent approximately 45 people. At year end, there were still approximately 400 people in need of counsel for these resentencing hearings. SADO continues to work to coordinate the appointment of counsel throughout the state, but this will be an ongoing, lengthy process; not every person out of the 582 people will be able to obtain appointed counsel right away. There are not enough qualified lawyers, which means the appointment of counsel will have to be prioritized and phased in. This is a constitutional violation, as these people are entitled to counsel now. But it is the reality of the situation given the lack of available and qualified attorneys. In total, over the span of several years, SADO hopes to represent 300 clients from this group if sufficient, stable funding is provided.

SADO's JLU staff began work on the *Czarnecki/Taylor* cases, but resentencings for this group of clients were halted in 2025 as parties awaited prosecutor sentencing decisions, which were due in January 2026.

SADO's juvenile lifer litigation is also supported by Project Reentry and the Criminal Defense Resource Center.

SADO's Project Reentry assisted approximately 130 clients in 2025 and hosted 4 reentry workshops for the community: SADO's reentry staff serves both direct appeals and the juvenile lifer populations. The reentry team prepares comprehensive reentry plans (CRPs) to assist clients with their return to the community to further goals of public safety. CRPs are also used at various stages of litigation: in negotiations with prosecutors, at resentencing hearings before judges, at parole board hearings, and upon discharge from incarceration. Each CRP contains personalized and individual information on support networks, detailed housing and resource investigation reports, resumes, employment and/or schooling prospects, and more.

The success of Michigan's Juvenile lifers is due in part to the services of SADO's Project Reentry. Juvenile lifers who have come home following resentencing have been a successful group overall as they have reentered their communities, with recidivism rates in the single digits, which is well below Michigan's standard recidivism rate of approximately 22%.

SADO’s Criminal Defense Resource Center provides training, support, and resources to practitioners around the state: The CDRC has trained hundreds of attorneys around the state to ensure those who are representing juvenile lifer clients do so competently. Juvenile lifer resentencing cases are incredibly complex and require an immense amount of resources, which is very challenging for the average practitioner. CDRC provides necessary guidance and tools to support in-house and external practitioners with this work.

Cost Per Case for Juvenile Lifer Sentencing Hearings from 2016 to December 19, 2025

The cost per case for SADO averages \$59,693.43 as outlined in the table below. This amount totals \$14,266,729.77 for the 239 sentencing hearings originally designated as life without parole, either negotiated term of years sentencings or contested *Miller* Hearings. This number includes some cases where work was done even though SADO ultimately withdrew from representation. This number does not capture the work being done on hundreds of SADO client cases that are still pending litigation. Hours per case in this table are calculated through December 19, 2025. Significant additional in-kind contributions have been made by SADO, including staffing hours, equipment, and administrative costs.

Type of Case Work	Avg Hours Per Case	Hourly Rate for Work (includes benefits/taxes)	Avg Costs
Legal	360	\$92.12	\$33,163.20
Mitigation / Investigation	363	\$59.18	\$21,482.34
Research/Document Review	23	\$40.51	\$931.73
Clerical	76	\$54.16	\$4,116.16
Average Total Per Case	822		\$59,693.43

Estimated cost for the 239 resentencing hearings	\$14,266,729.77
--	-----------------

SADO has successfully advocated for 2722.8 years in reduced prison terms for 239 juvenile lifer clients no longer serving life sentences (based on estimated average lifespan of 64 years). This results in an estimated savings to the state in reduced incarceration costs of \$105,665,813.59 (based on published average yearly cost of incarceration rate in effect at time of calculation). The return on investment in SADO’s Juvenile Lifer Unit to date is 7.6:1 (759%).

Contact:
Marilena David
Director | State Appellate Defender Office
Cell: 313-670-0309 | mdavid@sado.org

Report submitted on: February 27, 2026