

Appendix A:

Submissions and comments

We have consulted with the Department of Justice and Community Safety, Victoria Police and the 12 community organisations delivering the program. We considered their views when reaching our review conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

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Department of Justice and Community Safety	A-2
Anglicare Victoria	A-5
Banksia Gardens Community Services	A-7
Meli	A-10
Workways	A-13
The Youth Junction Inc	A-15

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Department of Justice and Community Safety

Secretary

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Our ref: 26085530

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
By email: [REDACTED]

Dear Mr Greaves

Proposed report: Preventing youth crime

Thank you for your letter of 26 August 2026 providing the proposed report on Preventing youth crime for final response. The Department of Justice and Community Safety (the department) has reviewed the report and is pleased that it incorporates much of the previous feedback.

However, we still consider the report relies on assumptions about program participants that do not align with the design of the Youth Crime Prevention Program (YCPP). The department maintains that program completion, rather than commencement alone, is an important factor and that program providers assess participant risk is using evidence-based tools by program providers.

I have attached further feedback for your consideration. The attached action plan, due for completion by 31 July 2027, addresses the 2 recommendations directed to the department.

If you have any questions or require further information, please contact [REDACTED], Executive Director, Data, Performance and Governance, on [REDACTED] or via email to [REDACTED].

Yours sincerely

Emma Cassar PSM
Secretary
08/09/2026

Encl. DJCS Feedback – Preventing youth crime, DJCS Action Plan – Preventing youth crime



PROTECTED**DJCS action plan**

Preventing youth crime

#	VAGO recommends that DJCS/relevant agencies:	Response	#	By:	By:
1	Ensures the Youth Crime Prevention Program reaches its intended participants and reduces offending and reoffending by: - introducing minimum participant data and record-keeping requirements to support participant eligibility decisions - establishing specific and measurable service delivery targets - collecting the data needed to evaluate the overall effectiveness of the Youth Crime Prevention Program.	Accept	1.1	Introduce and monitor strengthened reporting requirements to support: - providers to more consistently report participant eligibility and the amount and types of services delivered to participants - evaluation of program effectiveness and inform future refinements to program design.	31-Jul-2027
			1.2	Support program providers to collect and gain consent to share sensitive participant data to support the department to better understand post-program reoffending and evaluate the YCPP's effectiveness.	31-Jul-2027
			1.3	Propose to establish specific and measurable service delivery targets for future iterations of YCPP.	31-Dec-2026
2	Identifies the lessons learned from the Youth Crime Prevention Program and apply them both to the Youth Crime Prevention Program and similar youth crime prevention initiatives by: - ensuring its advice to the government is based on evidence - re-establishing and maintaining the community of practice for the Youth Crime Prevention Program so organisations can share their learning on what works to reduce youth crime - working with relevant agencies to apply lessons from the Youth Crime Prevention Program.	Accept	2.1	Strengthen reporting requirements for YCPP providers to support the development of a stronger evidence-base for the program's effectiveness, which will underpin future advice to government. Note this activity is complete.	31-Aug-2026
			2.2	Re-establish and maintain the YCPP Community of Practice in the 2026-27 funding period.	31-Dec-2026
			2.3	Continue to meet regularly with other agencies working on youth crime prevention including the Violence Reduction Unit,	N/A

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#	VAGO recommends that DJCS/relevant agencies:	Response	#	By:	By:
				Department of Families, Fairness and Housing and Victoria Police to share learnings across youth crime prevention programs. Note this activity is complete.	
			2.4	Incorporate evidence of the program's effectiveness gathered from the first round of quarterly reporting, using the new reporting template, into future program funding requests and implementation.	30-Nov-2026
			2.5	Hold quarterly meetings with providers to ensure insights and lessons from the program are shared with the department and that quantitative data from the reporting template is supplemented with qualitative data, to provide the fullest understanding of program delivery.	31-Dec-2026



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4 September 2026

Mr Andrew Greaves
Auditor-General
Email: [REDACTED]

Dear Mr Greaves

Re: Auditor General's report "Preventing Youth Crime"

Thank you for the opportunity to provide a response to your proposed report *Preventing Youth Crime*.

As you note in your proposed report, the nature of activities offered under the program varies by location. We would therefore like to take the opportunity to provide further information about the unique activities offered by Anglicare Victoria, the nature of the program, and some of the evidence of its efficacy.

Multi Systemic Therapy (MST) is a therapeutic program which involves a range of interventions tailored to each young person and their families' needs. The comment in the report about helping parents to monitor their children is accurate, but it significantly understates the scope of the work.

Our practitioners work intensively with families to strengthen parenting capacity, improve family relationships and communication, increase school engagement, reduce the influence of anti-social peers, build problem-solving and coping skills, address substance use and offending behaviours, and develop sustainable support networks that promote long-term behavioural change.

MST also works in close partnership with local police, schools and other community stakeholders to disrupt involvement in criminal peer groups, identify unsafe persons of interest who may be criminally or sexually exploiting young people, and strengthen protective factors around vulnerable adolescents.

As a result, while only one young person may be counted as receiving a service, multiple individuals directly benefit from the intervention and increased capacity within the family and support network.

I also note that this ecological model of offending, which acknowledges the importance of the surrounding environment, resonates strongly with the public health model of youth offending that underpins the Violence Reduction Unit's approach.

I welcome your recommendations focus on the importance of data collection, evaluation, and advice based on robust evidence. In the case of MST, the international evidence base has been developing for 30 years and includes over 60 studies and more than 130 peer-reviewed journal articles. Importantly, results have been replicated across different independent research teams.

Collectively, these studies capture the outcomes of work with 48,000 families. Importantly, the studies include documented impacts over the long-term. Further details are publicly available at the MST website: <https://www.msts services.com/research>. A brief overview is attached.

ABN 97 397 067 466 A member of Anglicare Australia. Incorporated by Act of Parliament

**BETTER
TOMORROWS**

The development and support of robust, evidence-based and solution-focused interventions in youth justice is vital, and I welcome the opportunity to respond to this report.

Yours sincerely



Paul McDonald
Chief Executive Officer



8 September 2026

Andrew Greaves
Auditor General
Victorian Auditor General's Office
Level 31, 35 Collins Street
Melbourne Vic. 3000

Dear Mr Greaves

Re: Response to VAGO's *Preventing Youth Crime* report

In response to your letter from the 26th of August, we are writing with some comments on your proposed report *Preventing Youth Crime* as requested.

The Youth Crime Prevention Program (YCPP) at Banksia Gardens Community Services (Banksia) has been an incredibly important service for people in the northern suburbs of Melbourne, and we believe it is important to address what we perceive are some of the limitations of the report in understanding effective youth crime prevention.

The key challenge in understanding the efficacy of the YCPP is also what underpins its potential. Variation from each LGA in theory of change, funded activities and target groups was a deliberate Departmental choice to enable hyper-local responses led by communities with persistently high levels of youth crime. From Banksia's perspective, this approach has been essential to meet the changing needs of our local community, enabling us to draw on knowledge and history with local families, to support young offenders, and those we know are at risk of entering the criminal justice system. However, this flexibility also makes evaluation difficult. There is also a general challenge in demonstrating the efficacy of crime prevention programs more broadly, without research underpinned by a control group of young people. The benefits are also realised over the long term and, as noted in the report, there are many factors impacting on the lives of young people other than the intervention.

As noted in the report, the variation between providers is significant and the Banksia program stands out as highly targeted and cost effective. 68 out of 118 identified Banksia participants were alleged offenders at the start of engagement and because we are a hyperlocal place based organisation we are also able to target young people engaged in high risk behaviour before they have come to the attention of police and registered a first offence. The cost per participant at Banksia Gardens was \$4,743 which is below 50% of the broader program average of \$9,643 per participant.

Drawing policy conclusions from the report poses several challenges. We agree that approaches to youth crime should be informed by the evidence and cost effective. In the popular imagination, the

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Banksia Gardens Community Services has Australian Charities and Non-for-Profits Commission (ACNC) and Australian Taxation Office (ATO) endorsement as a registered charity with Public Benevolent Institution status (PBI), a Tax Concession Charity and a Deductible Gift Recipient (DGR). Incorporated Association No A00007772U. ABN 54 264 568 661.



solution to youth crime is policing and punishment. While this is outside the scope of the VAGO report, it is important to note the lack of evidence to support these options when considering the efficacy of non-punitive, preventative approaches to youth crime. It is also important to note the general paucity of high-quality academic studies to guide the program design. But the absence of evidence is not the same as an evidence of absence.

Through our work with young people, we are acutely aware that persistent youth offenders are also some of the most vulnerable young people in society with histories of chronic and or significant trauma and neglect. This is most starkly illustrated by the overlap between people with Child Protection involvement and contact with the criminal justice system. In this context, effective prevention work is a long and at times slow process but one with the potential to have long term and intergenerational payoffs. When this is understood alongside our effective targeting, achieving a 36% rate of non-offending in 6 months is a significant achievement.

There is scant evidence that incarceration is an effective means of crime prevention and it is therefore useful to compare the cost of incarceration (without considering the other costs of crime) against the cost of supporting young people through our programs. The average cost per participant in our youth crime prevention program is \$4,743 for six months (or \$9,486 per year) and a single day in youth justice custody costs \$7,304. Put another way, supporting a young person in the community, providing guidance, social and emotional skill development, prosocial activities and links to education and employment, is equivalent to 31 hours and 10 minutes in custody. The cost of the program across the state over the last ten years is \$40 million dollars which equates to about 15 youth custody years. If as few as 30 of the 2,700 young people supported by one of the services avoided 6 months in youth custody, the program would be value for money. That is to say the program would be value for money by successfully working with just over 1% of clients.

There are also other benefits from the program outside of diverting people from the justice system. These benefits, captured in our many case studies, include young people acquiring and maintaining paid work, returning to school or other education pathways, improving their relationships and capacity to cope with adversity and building confidence to access support when times are tough. One of the more successful interventions at Banksia Gardens has been to give people work in our social enterprises. In the last two years we have given paid work opportunities to 23 young people with multiple risk factors for offending and those with substantial justice system involvement. The young people employed there have gone on to re-engage with education, transition to mainstream employment or have become operationally important at the social enterprises. It is hard to emphasise the significance of this intervention for people with high barriers to employment and intergenerational experiences of poverty.

At Banksia Gardens, we are confident in the efficacy and targeting of our program. We work with young people who are generally mid-teens and at the start of an escalating period of offending. They are typically disengaged from school and unemployed and have other compounding risk factors such as intergenerational justice system involvement and poverty, housing and family instability, mental

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health and/or drug and alcohol issues. They are often at a critical turning point and vulnerable to criminal exploitation. We are not able to change this trajectory for all young people but there are regular successful interventions and many young people, and their parents, will tell us that the support we provided was a critical factor in improving their lives. Limiting access to services such as ours for some of Melbourne's most vulnerable young people would be both a failure to protect the most vulnerable and a significant risk of escalation in local offending.

Banksia Gardens Community Services is an organisation committed to improving the lives of people in our community and this requires ongoing learning and development. We fully support the tightening and improvement of the program design and enhanced evaluation frameworks and look forward to working with the department to expand our service and to improve the evidence for effective crime prevention.

Should you require any additional information, please do not hesitate to contact me or my colleague Paul Atkinson, Manager Community Development and Youth.

Best regards,

A handwritten signature in blue ink, appearing to read "J. de Loma-Osorio", is written over a light blue rectangular background.

Jaime de Loma-Osorio
Acting CEO
Banksia Gardens Community Services

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Senior Manager, Education and Justice

Parliamentary reports and services

Victorian Auditor General's office

Re: Response to Victorian Auditor-General's Office Report on Crime Prevention Funding and the Youth Crime Prevention Program

Meli welcomes the opportunity to provide feedback on the Victorian Auditor-General's Office (VAGO) report examining Crime Prevention funding and the Youth Crime Prevention Program (YCPP).

Meli supports robust evaluation, accountability and evidence-informed investment in early intervention initiatives that seek to reduce young people's involvement with the criminal justice system while improving community safety outcomes. We acknowledge the value of the report in promoting continuous improvement across the crime prevention system and informing future investment decisions.

While we support the intent and objectives of the report, we believe it is important that findings are interpreted within the context of program design, participant complexity and the timeframes required to achieve sustainable behavioural change. Caution should be exercised when drawing conclusions from short-term offending data or applying aggregate findings across diverse service models, including the Reignite program delivered by Meli.

Our feedback focuses on three key areas:

- The interpretation of program outcomes and evaluation timeframes;
- The representation of program cohorts and eligibility criteria; and
- Clarification regarding the implementation of the report's recommendations.

Program Outcomes and Evaluation Timeframes

Meli acknowledges the reports' efforts to assess program effectiveness, however we note several considerations relevant to the understanding of outcomes.

Evaluation Timeframe

The report measures outcomes within six months of program commencement. Meli's Reignite program is designed as an intensive, longer-term intervention, with participants typically engaged for between a 12- and 18-month period. As a result, a six-month assessment period is unlikely to capture the full impact of the program or the longer-term behavioural changes it seeks to achieve.

Meli recommends that future evaluations incorporate longer-term outcome measures to provide a more accurate and comprehensive assessment of program effectiveness.



BCYF – Bethany Ltd trading as Meli Community

meli.org.au

Participant Risk Profile

Many young people are referred to Reignite during periods of escalating offending behaviour, increased police contact or significant personal and family instability. Continued offending during the early stages of engagement should therefore be considered within this context and not necessarily interpreted as evidence of reduced program impact.

For this client group, positive outcomes often emerge progressively through improvements in engagement, stability, education participation, family functioning and reduced risk factors before measurable reductions in offending behaviour are observed.

Early Program Exits

Outcome data relating to participants who exit the program prematurely, should be analysed separately from those who complete or substantially engage with the intervention.

Clients who disengage early have not received the full program intervention, and combining their outcomes with those who have completed the program may limit the accuracy of conclusions regarding overall program effectiveness.

Access to Organisation-Level Data

To support a more informed interpretation of the findings, Meli requests access to the organisation-level data underpinning Figure 3, including the police-recorded alleged offending data relevant to Meli's Reignite participants.

Access to this information would assist Meli in understanding the reported outcomes and identifying potential opportunities for service improvement.

Program Cohort and Eligibility Criteria

Target Cohort Representation

Meli notes positively that the report identifies Reignite as having the highest proportion of participants from the intended target cohort.

This finding demonstrates effective referral pathways and indicates that the program is successfully engaging young people with the level of risk and complexity it was specifically designed to support.

Clarification of Eligibility Criteria

Meli recommends clarification of the wording relating to participant eligibility and priority cohorts.

While young people aged 10 to 15 years are eligible for the program, young people residing in Residential Care are considered a priority cohort only where additional risk factors are present. The current wording may unintentionally suggest that residential care status alone determines prioritisation, which does not accurately reflect the program's eligibility framework.

Clarifying this distinction would improve the accuracy of the report and better reflect the program's intended target group.

Meli's Response to Recommendations

Recommendation 1

Meli supports Recommendation 1 and welcomes initiatives that strengthen program design, service delivery, performance monitoring and evaluation.

A strong evidence base is essential to ensuring crime prevention funding is directed toward approaches that achieve meaningful outcomes for young people and communities.

Recommendation 2

Meli generally supports Recommendation 2 but seeks further clarification regarding the intention to "work with relevant agencies to apply lessons from the YCPP."

Specifically, Meli would welcome additional information about any anticipated implications for:

- Service delivery models;
- Performance expectations and reporting requirements;
- Future commissioning arrangements; and
- Funding and investment approaches.

Greater clarity regarding implementation expectations will assist service providers to effectively contribute to future program improvements and sector-wide learning.

Meli welcomes continued engagement with the Department of Justice and Community Safety, Victoria Police, local partners and funded community organisations to strengthen program design, implementation and outcome measurement across the Youth Crime Prevention Program.

We believe future evaluation approaches should appropriately reflect participant complexity, recognise the staged nature of behavioural change and account for the longer-term engagement model required to achieve sustainable outcomes for vulnerable young people participating in Reignite.

Thank you for considering Meli's response. We remain committed to working collaboratively with government and community partners to improve outcomes for young people, strengthen community safety and ensure that crime prevention investment is informed by evidence, local context and the realities of the cohorts being supported.

Yours sincerely,



Josephine Taylor, Director Youth, Housing and South West, Meli



1st September 2026

Mr Andrew Greaves
Auditor-General
Level 31, 35 Collins Street
MELBOURNE VIC 3000

Dear Mr Greaves,

Re: Preventing Youth Crime Report, Feedback

Thank you for the opportunity to review the proposed report and invitation to provide a letter with comments on the report, consistent with the Audit Act 1994 (the Act).

Workways Australia delivers the Gippsland Engaged Mentoring (GEM) Program providing young people who have engaged in criminal activity or who are at risk of engaging in criminal activity and disconnecting with community, with access to a volunteer adult mentor for friendship and guidance. Our program is very important to the East Gippsland community, and has been running since 2002, representing more than two decades of support for young people in need in our regional area.

Our program improves life outcomes by helping participants remain in school, maintain employment and strengthen family and community relationships.

There are some elements of feedback that we wish to address in the VAGO report, Preventing Youth Crime.

- On page 25 of the report, it states that the Department raised concerns that Workways had not staffed the program adequately between January and June 2025. These concerns were subsequently addressed and Workways was able to demonstrate that we had in fact staffed the program appropriately during this time, and at the time of a resignation of a key staff member in September 2025, we were able to provide suitable support staff until the recruitment of an experienced and highly skilled new co-ordinator toward the end of 2025.
- VAGO did not conduct a site visit to review the Workways GEM program and as such this may have impacted the quality of their reporting on our program success. We understand that the audit standards did require VAGO to base evidence on documentary evidence but also acknowledge that seeing the program in action would have been beneficial to the review.
- Workways receives funding from the Department of Justice and Community Safety to deliver the GEM program, however we have not had success in engaging the local branch of the department in supporting GEM with youth referrals. Our existing participant cohort is drawn from community-based referrals and voluntary engagement.
- Whilst Workways recognises the need to monitor and evaluate the impact of public funding, we caution against setting stringent and uniform measures for the Youth Crime Prevention Program. The motivations and circumstances of youth engaging in criminal activity are diverse and complex, so providing the flexibility to lead different approaches to crime reduction is important.

The VAGO report looked at recidivism within a finite time period and determined that this should be a measure of success. Any organisation that works with young people knows that behavioural change takes significant time, and we aim to overturn learnt behaviours reinforced by their

environment and other external factors. It is recommended that a longitudinal study would be more appropriate to measure the success of youth crime prevention programs.

In addition, we recommend benchmarking against similar programs in other States such as the Kickstarter and Proven Initiatives programs in Queensland.

We would welcome future discussions about how our program could complement justice-related services or operate as a preventative option within a diversion framework.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Karly McCaskill', written in a cursive style.

Karly McCaskill
Chief Executive Officer
Workways Australia Ltd



Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office

Dear Auditor-General,

Re: Preventing Youth Crime

The Youth Junction Inc welcomes the Victorian Auditor-General's Office review of the Youth Crime Prevention Program (YCPP) and the opportunity to provide comments.

TYJ supports the overall intent of the report and its recommendations to strengthen program oversight, data collection, performance measurement and evaluation. We believe these measures have the potential to strengthen the evidence base for the continued investment in youth crime prevention and support continuous improvement across the program.

Having delivered the YCPP for 10 years, TYJ offers the following comments regarding the practical implementation of the recommendations.

Minimum participant data and record keeping

TYJ supports the introduction of minimum participant data and record-keeping requirements to strengthen consistency and transparency in participant eligibility decisions.

Implementation should, however, ensure that minimum requirements support rather than replace professional judgement. There is a risk that overly prescriptive requirements could unintentionally exclude young people who are at significant risk but do not meet a narrowly defined set of criteria.

Young people entering the YCPP can present with multiple and interconnected needs, and referral circumstances can change rapidly. Eligibility requirements should therefore allow sufficient flexibility to respond to individual circumstances and local context.

Consideration should also be given to how risk is identified. This could include evidence-informed indicators such as adverse childhood experiences and other known risk and protective factors, rather than relying solely on a limited set of eligibility criteria.

Any new administrative, data collection or eligibility requirements should also be accompanied by appropriate consideration of the resources required to implement them. Where requirements materially increase the administrative or service delivery burden on funded organisations, this should be reflected in program funding to ensure that additional compliance requirements do not reduce the resources available for direct work with young people.

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Specific and measurable service delivery targets

TYJ supports clearer and measurable expectations for service delivery. However, targets should recognise differences in participant complexity, program intensity and the nature of services delivered.

Care should be taken to ensure that measures do not create incentives to prioritise participant volume or short-term activity over the depth, duration and quality of engagement required by young people with more complex needs.

We believe service measures should therefore include an appropriate balance of activity, engagement, quality and outcomes.

Evaluation of the YCPP

TYJ supports the collection of data necessary to evaluate the overall effectiveness of the YCPP. We believe this evaluation should consider both offending outcomes and the broader circumstances of participants and their engagement with services.

In particular, interpretation of offending data should take account of the timing of offending, participant complexity, program intensity and duration of engagement. Some young people enter programs during periods of acute crisis or escalating offending behaviour, and offences recorded shortly after commencement may relate to behaviour occurring before, or very early in, the intervention.

Independent, regular and timely evaluation could also be considered to ensure program requirements remain appropriate and that outcomes are being achieved. This would provide an opportunity to identify emerging issues, assess whether program settings remain fit for purpose and support adjustments where evidence indicates they are required.

Broader indicators of progress and stability may also be relevant, including engagement with education, employment, family and community.

The encouraging outcomes identified by VAGO among TYJ's police-matched cohort are relevant in this context. While these findings cannot establish causation, they highlight the value of considering the characteristics of the cohort and the nature and duration of intervention when assessing program outcomes.

Sharing of practice

TYJ strongly supports the recommendation to improve the sharing of lessons across participating organisations. We welcome the re-establishment of communities of practice as a practical mechanism for sharing evidence, identifying effective approaches and supporting continuous improvement.

Overall, TYJ supports the direction of the recommendations. We encourage DJCS to consider the diversity of YCPP providers, participant cohorts and intervention models when determining how they are implemented.

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A consistent framework is valuable for accountability and evaluation, but sufficient flexibility will be important to ensure that implementation does not inadvertently reduce the responsiveness or effectiveness of community-based prevention work.

The Youth Junction looks forward to working with DJCS and other YCPP providers to strengthen the evidence base and improve outcomes for young people and the community.

Yours sincerely,

Blake Edwards
Chief Executive Officer
The Youth Junction Inc.