



Sample Cases: Thinking Broadly About Restitution

❖ Protection

- Fencing
 - *People v. Quevedo*, No. F049371, 2007 WL 520333 (Cal. Ct. App. Feb. 21, 2007).
- Guard Dog & Self-Defense Classes
 - *In re Isaiah F.*, No. A108434, 2005 WL 3047954 (Cal. Ct. App. Nov. 15, 2005).
- Moving Expenses
 - *People v. Bryant*, 122 P.3d 1026 (Colo. Ct. App. 2005).
 - *State v. Beechum*, 833 P.2d 988 (Kan. 1992).
 - *State v. Shepherd*, 60 A.3d 213 (Vt. 2012).
- Security Systems
 - *People v. T.R.*, No. D055049, 2010 WL 2332934 (Cal. Ct. App. June 10, 2010).
- Temporary Relocation
 - *Santiago v. State*, 669 So. 2d 334 (Fla. Dist. Ct. App. 1996).
 - *State v. Jaqua*, No. A008-1281, 2009 WL 3172133 (Minn. Ct. App. Oct. 6, 2009).

❖ Recovery

- Attorney Fees
 - *United States v. Bahel*, 662 F.3d 610 (2d Cir. 2011).
 - *United States v. Skowron*, 839 F. Supp. 2d 740 (S.D.N.Y. 2012).
 - *Arling v. State*, 559 So. 2d 1274 (Fl. Dist. Ct. App. 1990).
 - *People v. Oshana*, 965 N.E.2d 1174 (Ill. App. Ct. 2012).
 - *State v. Anderson*, 573 N.W.2d 872 (Wis. Ct. App. 1997).
- Credit Repair/Protection
 - *State v. Maxwell*, 802 N.W.2d 849 (Minn. Ct. App. 2011).
- Funerals
 - *Critsley v. State*, 573 So. 2d 167 (Fl. Dist. Ct. App. 1991).
 - *Hughes v. State*, 815 N.W.2d 602 (Minn. 2012).
 - *State v. Ceballos*, 230 P.3d 954 (Or. Ct. App. 2010).
- Internal Investigations
 - *United States v. Amato*, 540 F.3d 153 (2d Cir. 2008).
 - *State v. Brewer*, 989 P.2d 407 (Mont. 1999).
- Locating Family Members
 - *State v. Maidi*, 537 N.W.2d 280 (Minn. 1995).
- Lost Income (Past/Future)
 - *United States v. Evers*, 669 F.3d 645 (6th Cir. 2012).

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- *United States v. Serawop*, 505 F.3d 1112 (10th Cir. 2007).
- *People v. Giordano*, 170 P.3d 623 (Cal. 2007).
- Medical Costs (Past/Future)
 - *United States v. Doe*, 488 F.3d 1154 (9th Cir. 2007)
 - *State v. Howard*, 815 P.2d 5 (Ariz. Ct. App. 1991).
 - *People v. Phelps*, 48 Cal. Rptr. 2d 855 (Cal. Ct. App. 1996).
- Mental Health Costs (Past/Future)
 - *United States v. Pearson*, 570 F.3d 480 (2d Cir. 2009).
 - *W.S. v. State*, 174 P.3d 256 (Alaska Ct. App. 2008).
 - *State v. J.B.*, 643 So. 2d 402 (La. Ct. App. 1994).
 - *State v. Oakes*, 13 A.3d 293 (N.H. 2010).
 - *State v. Allen*, 858 P.2d 176 (Or. Ct. App. 1993).
 - *Commonwealth v. Boyles*, 595 A.2d 1180 (Pa. Super. Ct. 1991).
- Reward Money
 - *People v. Dillingham*, 881 P.2d 440 (Colo. Ct. App. 1994).
- Traditional Ceremonies
 - *United States v. Iron Cloud*, 312 F.3d 379 (8th Cir. 2002).
 - *People v. Keichler*, 29 Cal. Rptr. 3d 120 (Cal. Ct. App. 2005).
 - *State v. Tenerelli*, 598 N.W.2d 668 (Minn. 1999).
- Transportation
 - *United States v. Searle*, 65 F. App'x 343 (2d Cir. 2003).
 - *United States v. Estep*, 378 F. Supp. 2d 763 (E.D. Ky. 2005).
- Tuition
 - *In re Andrew C.*, 160 P.3d 687 (Ariz. Ct. App. 2007).
 - *Commonwealth v. Casanova*, 843 N.E.2d 699 (Mass. App. Ct. 2006).
- Veterinary Care
 - *Commonwealth v. Lee*, 947 A.2d 199 (Pa. Super. Ct. 2008).
- Warranties
 - *In re D.R.*, No. C061770, 2010 WL 2474807 (Cal. Ct. App. June 18, 2007).

❖ Property

- Property Repair
 - *People v. Stanley*, 279 P.3d 585 (Cal. 2012).
 - *People v. Smith*, 181 P.3d 324 (Colo. Ct. App. 2007).
 - *State v. Kennedy*, 528 N.W.2d 9 (Wis. Ct. App. 1994).
- Property Replacement
 - *United States v. Genschow*, 645 F.3d 803 (6th Cir. 2011).
 - *People v. Rednour*, 665 N.E.2d 888 (Ill. App. Ct. 1996).
- Other Property Remediation Efforts
 - *United States v. Oceanpro Indus.*, 674 F.3d 323 (4th Cir. 2012).
 - *United States v. Brock-Davis*, 504 F.3d 991 (9th Cir. 2007).
 - *United States v. Quillen*, 335 F.3d 219 (3d Cir. 2003).

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