

September 2017

Child marriage occurs when one or both parties are under 18 years old at the time of the marriage. It happens around the world, transcending culture, race, and religion. Child marriage takes place currently in the U.S., and is legal in every state, including Vermont. Some states allow marriage with judicial consent with no minimum age restriction.¹ The Pew Research Center estimates that 57,800 minors aged 15 to 17 were married in the U.S. in 2014.² Data from several U.S. states demonstrates child marriage's disparate impact on girls; approximately 90% of the children married in recent years were girls.^{3 4 5} Child marriage is regarded as a human rights violation by the United Nations,⁶ as well as the United Nations Children's Fund (UNICEF),⁷ Human Rights Watch,⁸ and the International Center for Research on Women (ICRW),⁹ among others. The abolishment of child marriage has been identified by the United States government as a key strategy to promote gender equality and fight poverty.¹⁰

WORLDWIDE MOVEMENT TO ABOLISH CHILD MARRIAGE

In the past few years, there has been increased attention and consensus, both globally and nationally, about the need to abolish child marriage.

In 2014, the U.K. and UNICEF's London Girl Summit aimed to mobilize efforts to end child marriage.¹¹ The United Nations has adopted resolutions setting out key recommendations to end child marriage,¹² declaring child, early, and forced marriage (CEFM) a human rights abuse,¹³ and adopting Sustainable Development Goals that include ending child marriage by 2030.¹⁴ The U.N.'s Human Rights Council adopted a resolution by consensus recognizing child marriage as a human rights violation.¹⁵ In 2016, UNICEF and the U.N. Population Fund launched the Global Programme on Accelerating Action to end Child Marriage in 12 countries.¹⁶

The African Union adopted a position calling for a minimum marriage age of 18,¹⁷ and a number of African countries also developed national strategies to end child marriage and raise their minimum age of marriage to 18.¹⁸ Worldwide, at least thirteen countries have changed laws or policies to help end CEFM since 2011.¹⁹

UNITED STATES PERSPECTIVE

In the U.S., bills have been introduced in many states around the country to eliminate or reduce child marriage. In March 2016, Virginia's governor signed a law that prohibits child marriage but allows exceptions for emancipated minors.²⁰ In March 2017, the New Jersey legislature passed a bill that

would end child marriage, but it was vetoed by Gov. Christie in May.²¹ In June 2017, Texas' governor signed a new law prohibiting child marriage with exceptions for emancipated minors.²² Connecticut's governor signed a law prohibiting child marriage, providing an exception for 16- and 17-year-olds with the consent of a parent and a judge.²³ New York increased the minimum marriage age to 19, or 17 with court approval.²⁴ Other states considering similar legislation include California,²⁵ New Hampshire,²⁶ Pennsylvania,²⁷ Massachusetts,²⁸ and Maryland.²⁹

In the U.S., every state requires parties to a marriage to be at least 18 or older. Several states set higher minimum ages. However, every state has exceptions; most allow minors age 16 and 17 to marry with parental consent, and many allow younger children to marry with judicial consent.³⁰ In New Hampshire, girls may marry at age 13 and boys at age 14 with parental and judicial consent.³¹ Similarly in Mississippi, boys can marry at age 17 and girls at age 15 with parental consent.³² Judges in Florida can allow marriages with no minimum age in the case of pregnancy.³³ Massachusetts has no minimum age for marriage where the minor's parents and a probate judge consent.³⁴

These laws can allow marriages of parties that would otherwise be in violation of statutory rape laws. For example, health record data in New Jersey showed that 91% of the minors who married between 1995 and 2012 were married to adults, and that 90% of those children who married were girls.³⁵ Someone 18 or older who has sex with a child under 16 can be charged with a felony in Idaho, yet between 2000

and 2010, more than 50 Idaho girls under the age of 16 were married to adult men age 18 or older.³⁶

According to New Hampshire’s vital statistics, between 1995 and 2012, 369 minors were married, 88% of them girls.³⁷ Virginia’s records show that almost 4,500 children as young as 13 were married between 2004 and 2013,³⁸ and in 2013 alone, 227 minors were married, 88% of whom were girls.³⁹ Alarmingly, 90% of the children married were married to adults, and 30 – 40% of those adults were 21 or older; some of the adults were decades older than the children they married.⁴⁰ Laws such as in New Hampshire that allow girls to marry younger than boys, and laws such as in Florida that allow pregnant girls to marry with no age minimum, further contribute to the disparate impact of child marriage on girls.

Vermont Laws

Vermont allows parties age 16 and 17 to marry with one parent’s consent, demonstrated by an affidavit on the back of the marriage license.⁴¹ Vermont does not allow the marriage of parties 15 or younger. Vermont’s statutes do not set forth that a minor must consent to a marriage. No court review is required.⁴² Vermont has a child marriage rate of 3.7 per thousand, less than the national average of 4.6, but higher than other New England states, including New Hampshire (3.2), Maine (2.2), and Rhode Island (2.0).⁴³ 221 Vermonters age 15¹ – 17 were married between the years of 2000 – 2016, according to Vermont Department of Health records.⁴⁴ 84% of those minors married in Vermont were girls, and many were wed to adults.⁴⁵

In Vermont, when minors marry, they are automatically considered legally emancipated.⁴⁶ Without a valid marriage or service in the armed forces, the emancipation process in Vermont requires an order from a judge. The judge must consider seven factors to determine if the minor has both the maturity and the ability to support themselves, and determine if emancipation is in the best interests of the minor.⁴⁷ The opinion and recommendations of the minor’s parents or guardians is one criteria weighed among others in evaluating the best interests of the minor.⁴⁸ Bypassing this review system puts minors at risk

who, once married, will remain emancipated even after a divorce.⁴⁹

WHY WE STILL ALLOW CHILD MARRIAGE

Historical, religious, and cultural precedent are influential factors in continuing the practice of child marriage. Arguments supporting the continuation of child marriage center around upholding religious customs, preventing children from being born out of wedlock, allowing young military service members to marry before being deployed thereby providing financial support to the couple, and giving girls self-determination. New Jersey Governor Chris Christie cited the preservation of religious customs and traditions as the reason behind his 2017 veto.⁵⁰ New Hampshire Rep. David Bates voted against a bill that would raise the minimum age of marriage, saying, “If we pass this, we will ensure forever that every child born to a minor will be born out of wedlock.”⁵¹ Rep. Bates also cited concerns about preventing 17-year-olds who join the military from marrying before deployment.⁵²

IMPACTS OF CHILD MARRIAGE IN THE U.S.

Perpetuating Gender Inequality

The U. S. government has acknowledged child marriage is a human rights abuse, and abolishing child marriage is part of a larger strategy to promote gender equality and to reduce poverty.

Ultimately [Child, Early, and Forced Marriage] CEFM arises from, and often perpetuates, gender inequality. It is a human rights abuse that contributes to economic hardship and leads to under-investment in girls’ educational and health care needs. CEFM undermines economic productivity, threatens sustainable growth and development, and fosters conditions that enable or exacerbate violence and insecurity, including domestic violence. It produces devastating repercussions for a girl’s life, effectively ending her childhood. Early marriage forces a girl into adulthood and motherhood before she is physically and mentally mature and before she completes her education, limiting her

¹ Until the passage of the Marriage Equality Act in 2009, the marriage of minors under the age of 16 was permitted with

judicial and parental consent in Vermont.

future options, depriving her of the chance to reach her full potential, and preventing her from contributing fully to her family and community.

U.S. Global Strategy to Empower Adolescent Girls, 2016⁵³

Negative Health, Education, and Poverty Outcomes

Child marriage has negative health effects for girls and women, even in the United States. Girls who marry at age 18 or younger face significantly higher health risks compared to women who marry at 19 or older, including a 23% higher risk of heart attack, diabetes, cancer, and stroke.⁵⁴ Women who marry as girls are significantly more likely to present with psychiatric disorders, including substance use disorders, mood disorders, anxiety disorders, and personality disorders.⁵⁵ Girls who marry as children are 45% more likely to become pregnant before the age of 18.⁵⁶

Girls who marry before age 18 are 300% more likely to be beaten by their spouses compared to women who are at least 21 when they marry.⁵⁷

Child brides face serious educational consequences as well; they are 50% more likely to drop out of high school, and four times less likely to graduate from college.⁵⁸ These and other barriers lead girls who marry young to be 31% more likely to live in poverty.⁵⁹

Increased Likelihood of Divorce

Age at marriage is one of the strongest predictors of divorce in the United States.⁶⁰ Overall, around 50% of marriages end in divorce.⁶¹ However, child marriages are significantly more likely to end in divorce than marriages entered later in life; almost 70% of marriages entered before age 18 end in divorce,⁶² and for those who marry in their mid-teens or younger, the divorce rate is closer to 80%.⁶³ Individuals who wait to marry are far less likely to divorce; fewer than thirty percent of marriages entered at age 25 or later end in divorce.⁶⁴ Divorce correlates with a higher rate of poverty than never marrying,⁶⁵ and has far-reaching emotional consequences for parents and children.

Risk of Force and Coercion

Allowing child marriage with parental or judicial consent can facilitate forced marriages of minors, which is not expressly prohibited in most U.S. states,⁶⁶ including Vermont.⁶⁷ A survey by the Tahiri Justice Center, a leading national organization dedicated to ending gender based violence against immigrants, found 3,000 known or suspected cases in 2009 and 2010 of girls in the U.S. as young as 15 forced to marry under threats of death, beatings or ostracism.⁶⁸ Unchained At Last, a national non-profit dedicated to ending child and forced marriage, estimates that hundreds of thousands of women and girls in the U.S. are in forced marriages.⁶⁹

Minimum age and parental consent laws were primarily put in place to prevent teenagers from marrying without their parents' consent, not to protect children. Few states' marriage laws set forth that the minor must also consent to the union, or require a court's intervention to assess whether the minor is being forced, frauded, or coerced into the union. Cultural and parental expectations could feel insurmountable to a child of 16 or 17. Teenagers who do not grasp the impact and consequences of marriage can easily grasp the consequences of disobeying their parents insisting they marry.

Minors can face force and coercion from friends and partners. The younger a teen begins sexual activity, the more likely it is a result of force or coercion.⁷⁰ Being physically or sexually abused makes teen girls six times more likely to become pregnant.⁷¹ Allowing exceptions for teen pregnancy could subject teens to further rape and abuse. Parental consent may not offer the protection one might hope; while 82% of parents feel confident that they could recognize the signs if their child was experiencing dating abuse, most parents (58%) could not correctly identify all the direct warning signs of abuse, according to a recent study.⁷²

Consent

Adolescents' brains are still developing until they reach their early 20s.⁷³ In Vermont and around the nation, the age of majority is 18. Those age 17 or under are not permitted to enter legally binding contracts, to make their own health or education decisions, including to purchase alcohol or cigarettes, and are not subject to the same

punishments for violations of criminal laws as adults. Allowing minors to marry is inconsistent with existing policy.

Barriers to Legal Assistance

A minor pressured to marry by their family may face barriers in seeking outside assistance to prevent the union. Obtaining legal counsel could prove quite difficult as retainer agreements made with minors are generally voidable. Organizations and shelters that provide support in these situations to adults could face fines and jail time for assisting a minor to leave home and seek shelter to prevent a nonconsensual marriage.⁷⁴

PUBLIC POLICY RESPONSE

Preventing Child Marriage

International human rights organizations have issued the same recommendation as the first step in ending child marriage: raise the minimum marriage age to 18.⁷⁵ UNICEF urges governments to establish 18 as the minimum legal age to marry without exception,⁷⁶ as does the U. N. Population Fund.⁷⁷ Human Rights Watch put forth a clear position, stating that

Adopting and implementing cohesive national legal frameworks that uphold international human rights standards is key. This includes making 18 the minimum marriage age, avoiding loopholes such as exceptions for parental consent, ensuring the laws require free and full consent of both spouses, requiring proof of age before marriage licenses are issued, and imposing penalties on anyone who threatens or harms anyone who refuses to marry.

– Human Rights Watch, *Ending Child Marriage: Meeting the Global Development Goals’ Promise to Girls*⁷⁸

Preventing Forced Child Marriage

Some states are using additional tools to prevent forced child marriage: explicitly requiring the consent of the minor to marry, and passing criminal laws that prohibit using force, threats, coercion, or fraud to compel individuals into marriage.

Most states do not require that a minor consent to their marriage. However, Hawaii⁷⁹ and Indiana⁸⁰ explicitly require the consent of the minor parties before a marriage can occur. Arizona,⁸¹ Mississippi,⁸² and Utah⁸³ explicitly require the consent of minors only when the consent of a judge is also required.

At least 10 states and territories have passed criminal laws aimed at preventing forced marriage, including California, the District of Columbia, Maryland, Minnesota, Mississippi, Nevada, Oklahoma, Virginia, the Virgin Islands, and West Virginia.⁸⁴

However, not all of these statutes can be applied to parents who force their child to marry; California, Minnesota, Mississippi, Oklahoma, Virginia, and the Virgin Islands have criminal statutes that criminalize forced marriage, but have language that either makes it unclear whether they apply to a parent forcing their minor child to marry, or explicitly do not apply to parents.⁸⁵ Minnesota and Oklahoma have criminal statutes that explicitly do not apply if the parents of the minor consent to the marriage.⁸⁶

On the other hand, the District of Columbia, Maryland, Nevada, and West Virginia’s criminal statutes do apply to parents.⁸⁷ Nevada’s statute considers forcing a marriage by force, violence, threats, or duress to be sex trafficking, a felony.⁸⁸ If the victim was a minor at the time of the offense, the punishment is life in prison with the possibility of parole. Nevada’s statute protects everyone, and can be applied to a parent who forced their child to marry.⁸⁹

Written by Hannah Myers
Research conducted by Ana Burke and Hannah Myers
Edited by Lilly Talbert

NOTES

- ¹ David McClendon and Aleksandra Sandstorm, Child marriage is rare in the U.S., though this varies by state, Pew Research Center, November 1, 2016, <http://www.pewresearch.org/fact-tank/2016/11/01/child-marriage-is-rare-in-the-u-s-though-this-varies-by-state/>.
- ² *Id.*
- ³ Fraidy Reiss, America’s Child-Marriage Problem, New York Times, October 13, 2015, https://www.nytimes.com/2015/10/14/opinion/americas-child-marriage-problem.html?_r=1
- ⁴ Allie Morris, N.H. House kills bill that would raise minimum marriage age to 18, Concord Monitor, March 9, 2017, <http://www.concordmonitor.com/bill-on-whether-minors-can-marry-8581515>.
- ⁵ Diana Cole, Children get married in the U.S., Too: #15Girls, National Public Radio, October 28, 2015, <http://www.npr.org/sections/goatsandsoda/2015/10/28/452540839/children-get-married-in-the-u-s-too-15girls>.
- ⁶ U.N. Resolution 71/175. Child, early and forced marriage, adopted December 19, 2016, http://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/71/175&referer=http://www.un.org/en/ga/71/resolutions.shtml&Lang=E.
- ⁷ Child Protection Information Sheet: Child Marriage, The United Nations Children’s Fund (UNICEF), May 2006, http://www.unicef.org/protection/files/Child_Marriage.pdf.
- ⁸ Nisha Varia, Ending Child Marriage: Meeting the Global Development Goals’ Promise to Girls, Human Rights Watch, 2015, <https://www.hrw.org/world-report/2016/ending-child-marriage>.
- ⁹ Child Marriage, International Center for Research on Women, last visited June 23, 2017, <https://www.icrw.org/issues/child-marriage/>.
- ¹⁰ United States Global Strategy to Empower Adolescent Girls, U.S. Department of State, March 15, 2016, 5 – 6, <https://www.state.gov/s/gwi/priorities/adolescentgirls/254674.htm>.
- ¹¹ It takes a movement: reflecting on five years of progress towards ending child marriage, Girls Not Brides, 2016, <http://www.girlsnotbrides.org/reports-and-publications/it-takes-a-movement/>.
- ¹² *Id.*
- ¹³ 5 signs we made progress towards ending child marriage in 2016, Girls Not Brides, December 16th, 2016, <http://www.girlsnotbrides.org/5-signs-made-progress-towards-ending-child-marriage-2016/>.
- ¹⁴ It takes a movement, supra note 11.
- ¹⁵ It takes a movement, supra note 11.
- ¹⁶ 5 signs we made progress, supra note 13.
- ¹⁷ It takes a movement, supra note 11.
- ¹⁸ 5 signs we made progress, supra note 13.
- ¹⁹ It takes a movement, supra note 11.
- ²⁰ Jenna Portnoy, Why 13-year-olds can no longer marry in Virginia, The Washington Post, July 3, 2016, https://www.washingtonpost.com/local/virginia-politics/why-13-year-olds-can-no-longer-marry-in-virginia/2016/07/03/03849e46-3ef9-11e6-a66f-aa6c1883b6b1_story.html?utm_term=.ba5df6b59e1c.
- ²¹ David Madden, Proposed Child Marriage Ban in NJ Nixed by Governor Christie, CBS Philly, May 12, 2017, <http://philadelphia.cbslocal.com/2017/05/12/proposed-child-marriage-ban-in-nj-nixed-by-governor-christie/>.
- ²² Meagan Flynn, Texas Legislature Passes Bill Aimed to End Its Forced Child Marriages Problem, Houston Press, May 22, 2017, <http://www.houstonpress.com/news/bill-passed-in-texas-lege-may-end-its-forced-child-marriages-problem-9454791>.
- ²³ H.B. 5442. Reg. Sess. 2017. (C.T. 2017).
- ²⁴ Cuomo Signs Bill Doing Away with Child Marriage In New York State, Associated Press, June 20, 2017, <http://newyork.cbslocal.com/2017/06/20/new-york-state-child-marriage/>.
- ²⁵ S.B. 273. Reg Sess. 2017. (C.A. 2017).
- ²⁶ H.B. 499. Reg. Sess. 2017. (N.H. 2017).
- ²⁷ H.B. 1038. Reg. Sess. 2017. (P.A. 2017).
- ²⁸ H.B. 2310. Reg. Sess. 2017. (M.A. (2017)).
- ²⁹ H.B. 799. Reg. Sess. 2017. (M.D. 2017).
- ³⁰ McClendon, supra note 1.
- ³¹ Morris, supra note 4.
- ³² Miss. Code Ann. § 93-1-5.
- ³³ FLA. STAT. § 741.0405.
- ³⁴ M.G.L. ch.207 § 25.
- ³⁵ Reiss, supra note 3.
- ³⁶ Fraidy Reiss, Why can 12-year-olds still get married in the United States?, Washington Post, February 10, 2017, https://www.washingtonpost.com/posteverything/wp/2017/02/10/why-does-the-united-states-still-let-12-year-old-girls-get-married/?utm_term=.c039f3179840.
- ³⁷ Morris, supra, note 4.
- ³⁸ Child Marriage in America: Current Laws Are Failing to Protect Vulnerable Children and Teens, Tahirih Justice Center, February 20, 2015, <http://www.tahirih.org/news/child-marriage-happens-in-the-u-s-too/>.
- ³⁹ Cole, supra note 5.
- ⁴⁰ Child Marriage in America: Current Laws Are Failing to Protect Vulnerable Children and Teens, Tahirih Justice Center, February 20, 2015, <http://www.tahirih.org/news/child-marriage-happens-in-the-u-s-too/>
- ⁴¹ 18 V.S.A. §§ 5131 - 5142.
- ⁴² 18 V.S.A. §§ 5131 - 5142.
- ⁴³ David McClendon and Aleksandra Sandstorm, Child marriage is rare in the U.S., though this varies by state, Pew Research Center, November 1, 2016, <http://www.pewresearch.org/fact-tank/2016/11/01/child-marriage-is-rare-in-the-u-s-though-this-varies-by-state/>.
- ⁴⁴ Vermont Marriages Involving Minors (< age 18), 2000-2016, Vermont Department of Health, September 12, 2017. See Appendix 1.

⁴⁵Vermont Marriages Involving Minors (< age 18), 2000-2016, Vermont Department of Health, September 12, 2017. See Appendix 1.

⁴⁶ 12 V.S.A. § 7151.

⁴⁷ *Id.*

⁴⁸ 12 V.S.A. § 7155.

⁴⁹ 12 V.S.A. § 7151.

⁵⁰ Sebastian Malo, U.S. governor rejects measure to ban child marriage, Reuters, May 11th, 2017, <http://www.reuters.com/article/us-usa-trafficking-childmarriage-idUSKBN1872VB>.

⁵¹ Morris, *supra*, note 4.

⁵² New Hampshire House rejects bill raising minimum marriage age to 18, Associated Press, March 9th, 2017,

<https://www.boston.com/news/politics/2017/03/09/new-hampshire-house-rejects-bill-raising-minimum-marriage-age-to-18>.

⁵³ U.S. Department of State, *supra* note 6.

⁵⁴ Reiss, Washington Post, *supra* note 31.

⁵⁵ Yann Le Strat, MD, et al., Child Marriage in the United States and Its Association with Mental Health in Women, Pediatrics, September 2011, Vol. 128 / Issue 3, <http://pediatrics.aappublications.org/content/128/3/524>.

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ Age of Marital Capacity, pg. 1844-5. 2012.

⁶¹ Tim B. Heaton, Factors Contributing to Increasing Marital Stability in the United States, Journal of Family Issues, Vol. 23, 392, 407 (2002),

<http://journals.sagepub.com/doi/pdf/10.1177/0192513X02023003004>.

⁶² Naomi Seiler, Is Teen Marriage a Solution? Ctr. For Law & Soc. Policy, 7, Fig.5 (2002), www.clasp.org/resources-and-publications/archive/0087.pdf.

⁶³ Heaton, *supra* note 60, at 407.

⁶⁴ Heaton, *supra* note 60, at 407.

⁶⁵ Daniel T. Lichter and Deborah Roempke Graefe, Finding a Mate? The Marital and Cohabitation Histories of Unwed Mothers, in Lawrence Wu and Barbara Wolfe, eds., Out of Wedlock: Trends, Causes and Consequences of Non-marital Fertility (2001).

⁶⁶ Criminal Laws Addressing Forced Marriage in the United States, Tahirih Justice Center, July, 2013.

⁶⁷ *Id.*

⁶⁸ Forced Marriage in Immigrant Communities in the United States: 2011 National Survey Results, Tahirih Justice Center, September 2011,

<http://www.tahirih.org/wp-content/uploads/2015/03/REPORT-Tahirih-Survey-on-Forced-Marriage-in-Immigrant-Communities-in-the-United-States.pdf>.

⁶⁹ About Arranged/Forced Marriage, Unchained at Last, last visited June 23, 2017, <http://www.unchainedatlast.org/about-arranged-forced-marriage/>

⁷⁰ Statutory Rape: A Guide to State Laws and Reporting Requirements, The Lewin Group for the U.S. Dept. of Health and Human Services, December 15, 2004,

<http://aspe.hhs.gov/hsp/08/sr/statelaws/report.pdf>, citing research findings that almost threequarters of women who had intercourse before age 14, and 60 percent who did so before age 15, reported having a forced sexual experience.

⁷¹ Dating Abuse Statistics, loveisrespect.org, last visited June 23, 2017, http://www.loveisrespect.org/pdf/Dating_Abuse_Statistics.pdf.

⁷² Troubled Economy Linked to High Levels of Teen Dating Violence & Abuse Survey 2009, Teen Research Unlimited for Fifth & Pacific Companies, Inc. (Liz Claiborne, Inc.), May 2009, <https://www.breakthecycle.org/dating-violence-research/troubled-economy-and-teen-dating-abuse>.

⁷³ National Institute of Mental Health (US) Bethesda (MD): Department of Health and Human Services (US), The teen brain: still under construction, NIH Pub. No.

11-4929, 2011, <http://www.nimh.nih.gov/health/publications/the-teen-brain-still-under-construction/index.shtml>

⁷⁴ 13 V.S.A. § 1311.

⁷⁵ Child Marriage, United Nations Population Fund, last visited June 23, 2017, <http://www.unfpa.org/child-marriage>.

⁷⁶ Child Protection Information Sheet: Child Marriage, The United Nations Children's Fund (UNICEF) (May 2006), http://www.unicef.org/protection/files/Child_Marriage.pdf.

⁷⁷ United Nations Population Fund, *supra* note 69.

⁷⁸ Nisha Varia, Ending Child Marriage: Meeting the Global Development Goals' Promise to Girls, Human Rights Watch, 2015, <https://www.hrw.org/world-report/2016/ending-child-marriage>

⁷⁹ Haw. Rev. Stat. § 572-1.

⁸⁰ Ind. Code Ann. § 31-11-1-4 - § 31-11-1-6.

⁸¹ Ariz. Rev. Stat. Ann. § 25-102.

⁸² Miss. Code Ann. § 93-1-5.

⁸³ Utah Code Ann. § 30-1-2, § 30-1-9.

⁸⁴ Criminal Laws Addressing Forced Marriage in the United States, *supra* note 66.

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ Criminal Laws Addressing Forced Marriage in the United States, *supra* note 66.

⁸⁸ Nev. Rev. Stat. 201.300

⁸⁹ Criminal Laws Addressing Forced Marriage in the United States, *supra* note 66.

VERMONT MARRIAGES INVOLVING MINORS (< AGE 18), 2000-2016 ^{1,2}						
Year of Marriage	Number of Marriages	Number of Applicants				
		< = 15	16	17	# Males <=17	# Females <=17
2000	24 ⁽³⁾	1	7	17	2	23
2001	31	0	9	22	3	28
2002	25 ⁽³⁾	0	8	18	2	24
2003	19 ⁽³⁾	0	4	17	2	19
2004	21	0	11	10	4	17
2005	20 ⁽³⁾	0	3	18	5	16
2006	20	1	5	14	5	15
2007	14 ⁽³⁾	0	2	13	3	12
2008	15	0	2	13	0	15
2009	6	0	0	6	1	5
2010	7	0	3	4	1	6
2011	10 ⁽³⁾	0	0	11	3	8
2012	7 ⁽³⁾	0	2	6	2	6
2013	4	0	1	3	0	4
2014	19 ⁽³⁾	0	0	20	4	16
2015	4	0	1	3	2	2
2016 ⁽⁴⁾	7	0	3	4	2	5
<i>(1) Data from Department of Health Vital Statistics System, September 12, 2017.</i>						
<i>(2) Marriages on or after September 1, 2009 include same sex couples.</i>						
<i>(3) One or more marriages involved two minors.</i>						
<i>(4) Counts are preliminary and subject to change.</i>						

Appendix 1