Litigating Against Domestic Violence

*Social Justice Lawyering*

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Please
Turn off Cell Phones & Pagers!
In memory of Jessica Gonzales’s children: Rebecca, 10, Katheryn, 8, and Leslie, 7; murdered by their father after > 6 contacts with police that night & police refusal to enforce her restraining order.

*Castle Rock v. Gonzales, 125 S.Ct. 2796 (2005).*
Must have the humility & ethics to rethink the rhetoric, doctrine & practice in domestic violence law.
SPECIAL OLYMPICS

STORY

HOW DO WE LEARN TO HELP ALL BE SAFE TOGETHER?
Adapted from:

* Sarah Buel, *Domestic Violence and the Law: An Impassioned Exploration for Family Peace*, 33 ABA FAMILY LAW QUARTERLY 719 (Fall 1999); and

1. 1970’s Started Grass Roots Organizing for Battered Women’s Rights

A. Safe Homes: people opened their homes to abuse victims.

B. Shelters: initially many collaborated with Rape Crisis Centers to create short-term shelter for battered women & their children.

C. Started with private funds; unable to get state money.
D. Goals

1. Victim Safety
2. Offender Accountability
Battered women increasingly turn to the courts, often with poor results.

*State Gender Bias Studies find improper case handling based on lawyer’s & judge’s inadequate knowledge of domestic violence.*
Deficient legal education + omission in CLE's = problematic practices

True in other professions as well e.g., business, education, medicine, mental health, social work.
*What Works?*

WRAPPING VICTIMS IN SERVICES

e.g. U.T. Law Students Survivor Support Network: $$ and advocacy
E. What Works?

1. SAFETY PLANNING
   - www.abanet.org/domviol

2. ECONOMIC EMPOWERMENT
   * Family of 3 Welfare in Calf = $607 per month
   * Tx: $208    Miss: $120
   50% of states pay < $400 per mo.
Why don’t victims just leave?

1. 
2. 
3. 
4. 
5. 
6. 
7.
Real Batterer’s 4 page List:

- “Do not ever open a door or window if I tell you not to.”
- “When I ask you a question, answer within 30 seconds or be prepared to pay for it.”
- “You will always humbly comply with any request I make.”
- “Do not cry or scream loud enough for the neighbors to hear.”
- “Do not ever physically resist me.”

By Charles Gravina, an attorney and convicted batterer.
F. COURT WATCHES

1st recruit volunteers

2nd train them to document how victims are treated in court - did judge follow law?

3rd write up report of good & bad conduct

4th meet with judge to discuss & plan improvement.

5th only if no action, then go to press.

* e.g. my law students + U of Oregon + otros
4 Alaska grandmothers transformed their court...

- by sitting in court & documenting practices
- by meeting with judges & prosecutors to discuss problematic practices
- by following up to ensure reforms held.
Materials on Court Watch available from the Battered Women’s Justice Project

www.bwjp.org
*Targeted Court Watch:*

- Just show up for specific cases with problem judges
- Still have dramatic results!
Discourses of Resistance

1st Battered women’s action in assault

- submissive acts
- role of drugs/ alcohol
- active self-defense
- “immoral” conduct negating victimhood
2nd Efficacy of Attempts to Leave

- Help-seeking behaviors
- Victim skills & strengths
- Realistic resources
3rd Resistance to resuming relationship

- who controls?
- failure to resist
- Success

*Melissa Hamilton’s Ph.D. Dissertation analyzing Calf: JUDICIAL DISCOURSES INVOLVING DOMESTIC VIOLENCE AND EXPERT TESTIMONY (2006).*
II. Critical Race Theory, Feminist Legal Theory & Critical Legal Studies should inform practice.

Facially neutral laws often have disparate race, gender & class impact.
A. Disproportionate arrest, prosecution & incarceration of men & women of color

*How remedy?
1. Judicial Oversight Initiative:

- Milwaukee County: city vs. suburban police responses:
- Whites often receive citation & fines, Blacks arrested.
As a result:

Blacks = 24% population, but = 66% of domestic violence cases in DA office;

Whites = 62% pop, but = 32% of dv cases.
Similar bias with drugs:

- African-Americans constitute just 13% of all drug users,
- But = 35% of defendants arrested for possessing drugs,
- 55% of those receiving convictions, and
- 74% of those being incarcerated.

Former drug czar William Bennett says, “The typical cocaine user is white, male, a high school graduate employed full time and living in a small metropolitan area or suburb.”
Women of Color

- Incarceration of all females increased 88% from 1990 to 1998,
- But 2/3 are women of color, most of whom are African-American.
- Bureau of Justice Statistics (BJS) predicts a 95% increase in the rate of imprisonment for African-American women;
- at the same time it projects a 15% increase for white women.

Research shows drug & alcohol abuse rates are higher for pregnant White women than pregnant Black women, but Black women are about 10 times more likely to be reported to authorities under mandatory reporting laws.
Youth of Color

= 32% of youth, but 68% of those in secure detention
Burns Institute works to reduce overrepresentation of youth of color in the juvenile justice system. This IS a solvable problem!

www.burnsinstitute.org
Stakeholders

- Community Groups/Youth
- Judges
- Politicians
- Police/Sheriff
- Prosecutor/Defense
- Detention and Probation
*CULTURAL COMPETENCE*

- What do you need to learn about parties’ race, religion, culture, sexual orientation, disabilities?
- How ensure students/ judge/ jury understand issues?
- Is there a student or State Bar Committee to examine disparate treatment?
III. CIVIL LAW

A. FAMILY LAW

1. **CUSTODY**: even with presumption that batterer not have custody, too many courts give batterers the kids

2. **VISITATION**: must ensure availability of supervised visits, see TX & LA laws presuming supervised visits for batterers
B. Protective Orders

1. We wanted the State to order batterers to stay away from the victims.

2. 1977 basic orders, but added:
   - Child support & custody;
   - Kicking batterer out of the house;
   - Refrain from abuse;
   - No contact with the victim; and
   - Any other remedy necessary to keep her safe.
Calf Domestic Violence Prevention Act permits court to enjoin party from:

“molesting, attacking, striking, stalking, threatening, sexually assaulting, battering, harassing, telephoning, including but not limited to, annoying telephone calls, destroying personal property, contacting, either directly or indirectly, by mail or otherwise, coming within a specified distance of, or disturbing the peace of the other party.”
2. No Mutual Orders → Calf Domestic Violence Prevention Act provides that a court may not issue mutual orders:

(a) Unless each party presents written evidence of abuse and

(b) “The court makes detailed findings of facting indicated that both parties acted primarily as aggressors & that neither party acted primarily in self-defense.”
Victim did not have a lawyer & needed a Spanish language interpreter;

Husband’s lawyer requested mutual RO & “TRIAL COURT DID NOT INQUIRE ABOUT THE ALLEGATIONS OF TERRIBLE DOMESTIC VIOLENCE IN MONTERROSO’S APPLICATION.”

“THE INFERENCE IS THAT THE TRIAL CT DECIDED THAT MUTUAL RESTRAINING ORDER WAS AN EXPEDIENT WAY TO PROTECT OR MOLLIFY MORAN.”
Monterroso v. Moran, 37 Cal.Rptr.3d (Cal., 2006)

- “Domestic violence is a grievous problem in today’s world, & its victims often have few places to turn.

- The courts must be sensitive to allegations of domestic violence, root out the truth in each case, & protect victims when possible.

- Victims should be guided through the judicial system, not herded.”

- “Trial court is directed to rule on the merits of Monterroso’s application for restraining orders against Moran.”
“Victims of domestic violence who have not engaged in an act of violence are confused, humiliated & degraded by orders restraining them from such conduct.”

“Perhaps a potentially volatile courtroom situation is diffused somewhat by issuing orders against both parties, but respect for the law is undermined.”
3. Most protective orders last 1 year, but Alabama, Colorado, Hawaii, and Montana provide protective orders of "permanent duration unless otherwise ordered by the court."
4. A number of states now allow for rape victims to obtain protective orders. e.g. Texas & Arkansas
5. Calf. AG’s 2005 DV Study

- 20-50% of protective orders not promptly served
- Lack of enforcement of gun seizure requirements
- Lack of enforcement of protective orders
“What sort of flowers say, ‘I promise to obey the restraining order’? (= Witness Tampering!)
Calf. AG Study: Prosecution

- Found tremendous variation among counties, with some failing to properly arrest & prosecute *majority* of cases!
- Least experienced prosecutors handled DV cases
- Lack of coordination between shelters & prosecutors in serving victims
C. TORT LITIGATION

1. Against the batterer
2. Law enforcement
3. Physicians, Hospitals
4. Mental Health Providers
5. Employers
6. Duty to Warn

*Under frameworks of:

*Negligence
*Intentional Torts
*Professional Malpractice
e.g. Vt. Atty Alan Rosenfeld
sues child molesters in tort

*Uses judgments to set up trust funds for abused kid’s college funds, counseling, etc.
Economic Torts

- Waste
- Depletion of Assets
- Fraud
- Breach of Fiduciary Duty
- Fraudulent Conveyance
- Excessive Gifts to Children
Thurman vs. City of Torrington (Conn., 1984), for police failing to respond to woman's complaints about domestic violence, subjecting political subdivision to § 1983 liability.

*Courts have said: Where a protective order exists to protect the victim of violence, a special relationship exists.
D. Con Law Litigation

1. *Gonzales v. Castle Rock*
   = procedural due process claim
   = a bizarre & misguided opinion epitomizing the troubled waters of domestic violence advocacy today.
The case raises profound questions about the powers of police & constitutional rights of abuse victims to minimal levels of protection.
Castle Rock Case Facts:

- 5 p.m. on same day batterer Simon Gonzales served with RO, he kidnaps his 3 daughters from their front yard.
- 7:30 Mom, Jessica Gonzales, calls Castle Rock P.D. requesting they find & arrest Simon for violating the RO; they tell her to call back at 10 if children not returned.
- 8 p.m. JG speaks with SG via cell phone; he says he is at Denver amusement part;
- JG calls Castle Rock P.D. to report his whereabouts & they tell her to call back at 10 p.m.
10 p.m. JG calls Castle Rock P.D. to report children still missing; she is told to call back at midnight.

Just before midnight, JG called back Castle Rock P.D. from SG’s home to report that he had not returned.

PD promised to come there to take a report, but after an hour of waiting, JG went to the PD to file a report herself.

She begged the officer to investigate, but instead, he went to dinner.
At about 3 a.m., Simon Gonzales drove his pickup truck to the Castle Rock police station and began shooting at the building.

Officers fired back and killed Gonzales.

The bodies of the three girls were found in his truck – they had been shot to death by their father the night before.
J. Scalia for Majority held:

- Under due process clause, respondent did not have property interest in police enforcement of her restraining order *EVEN* when they had probable cause to believe it had been violated.
*decision reflects*

- irresponsible denial,
- abuse of power, and
- extraordinary ignorance about the true legal landscape for abuse victims.
It’s also about gender:

In 1999 females experienced 671,110 (85%) violent victimizations by intimate partners.

ALL LAW IS SOCIAL POLICY.

HERE COMMON LAW DECISION WOEFULLY OUT of TOUCH with SOCIETAL NORMS & BASIC TENETS of JUSTICE
Congressman Dingle said to Supreme Court:

“You write the content and I’ll write the procedure, and I’ll screw you every time.”
F. Immigration Law

- There are numerous reports of police calling the Department of Homeland Services (formerly INS) to pick up battered immigrants who call for help.

- Estimates that 70% of battered immigrants don’t speak English when they get here.
Remedies for Battered Immigrants

1. **VAWA Self-Petitioning**: must be abused spouse of U.S. citizen or Legal Permanent Resident & “of good moral character”;

2. **VAWA Cancellation of Removal**: must proved battered by 1 of above + lived in U.S. < 3 yrs + removal would create extreme hardship for her & kids; only 1 heard by immigration judge with right of appeal, ultimately to Atty. General.
3rd remedy: U-Visa

1. petitioner must be the victim of certain types of criminal activity;
2. she must show that she suffered substantial physical or mental abuse; and
3. petitioner must be helpful or likely to be helpful with the investigation of the crime.

IV. CRIMINAL LAW

A. PROSECUTION AGAINST BATTERERS

1. Because batterers so often intimidate victims from testifying, tried going forward using HEARSAY EXCEPTIONS → especially EXCITED UTTERANCES . . .
2. Post-\textit{Crawford} Prosecutions

If TESTIMONIAL statements are to be introduced at trial, accused must have had opportunity to CONFRONT the declarant in prior proceeding \textit{AND} witness must be UNAVAILABLE to testify.

Begs Q: What is testimonial?

Supreme Ct declined to define, other than statements to gov’t officials & those taken in “formal” setting
Crawford Update: Where Are We Now?

- March 20, 2006, the U.S. Supreme Court heard 2 domestic violence cases that should clarify implementation of Crawford.
In *Davis v. Washington*, the Court will decide whether an alleged victim’s statements to a 911 operator naming her assailant, admitted as “excited utterances” under the jurisdiction’s hearsay law, constitute “testimonial” statements subject to Confrontation Clause restrictions specified in *Crawford v. Washington*.
In *Hammon v. Indiana*, the Court will decide whether an oral accusation made to an investigating officer at the scene of an alleged crime is a testimonial statement with the meaning of *Crawford*. 
Crawford says: “the rule of forfeiture by wrongdoing (which we accept) extinguishes confrontation claims. . . “

*Can argue for per se Unavailability with pattern of abuse?
*Witness Tampering = most common domestic violence offense but least charged

TEXAS Penal Code § 36.06 Obstruction or Retaliation
Doctrine of FORFEITURE by Wrongdoing = The accused loses the right to confrontation if he causes the witness’s unavailability.


In domestic violence relationships, “the potential for abuse & manipulation of the complainant & the Criminal Justice System itself is great as the accused may exert power & control over his or her partner. . . Conduct that may not rise to criminal behavior may nonetheless be improper amounting to forfeiture of a right.”
B. STALKING

FEAR = Common Currency of Stalkers

- Document victim’s level of fear
- Measured by “reasonable person” in her situation
- So, is CRUCIAL to document ENTIRE history of ALL FORMS of ABUSE
C. Battered Women as Defendants

1. Majority of female offenders charged with drug & property crimes
   - 80 - 85% of incarcerated females in U.S. attribute their incarceration to their association with a batterer.

See ELIZABETH M. SCHNEIDER, BATTERED WOMEN & FEMINIST LAWMAKING 265 n.8 (2000).
2. Welfare Fraud

- Vast majority not receiving child support
- Welfare Dept. doesn’t turn over case to DA until you owe $2,000
- DA only gives 1 yr to pay back: on min wage you earn $120 wk x 52 = $6240 per year
  - = set up!
- So, abuse victim ends up with crim record!
De-Criminalize Welfare Fraud

- DA Ronnie Earle working with us to allow up to 5 years to repay;
- No conviction if repaid;
- Instead of probation, can attend (free) financial literacy class;
- Teach about rights & sources of $$$. 
3. Kill/ harm Batterer

*Premised on Law of Self-Defense,*

- A person is justified in using deadly force against another
- to the degree she reasonably believes that deadly force is immediately necessary to protect herself against the other's use or attempted use of unlawful deadly force
- or to prevent the other's imminent commission of aggravated kidnapping, murder, sexual assault, aggravated sexual assault, robbery, or aggravated robbery.

Then why don’t they leave?

1. Lack money
2. No job skills
3. Low self-esteem
4. Lack support network
5. No place to go
6. Prior bad experience with system
7. Own criminal record
Obstacles to Leaving, continued:

8. Don’t speak English
9. INS fears
10. Mental health issues – depression
11. Medical problems
12. Disabilities
13. Addiction
14. Fear of Child Protective Services
Obstacles to Leaving, continued:

15. Fear of retaliation
16. Fear of losing child custody
17. Self-blame
18. Faith dictates staying
19. Belief that kids need father-figure
20. No car
21. No knowledge of resources
Ineffective counsel failed to argue cumulative effect of physical & mental abuse on battered defendant’s perception of danger.

4. Failure to Protect Cases

- CPS Targets women who are poor, of color, or both
- NYC *In Re Nicholson* case:
  - battered women charged with “engaging in domestic violence”
Judge Jack Weinstein said:

- system of court-appointed counsel was a “sham”
- Many years of “pitiless double abuse of these mothers” violated their rights under the 4th, 9th, 13th and 14th Amendments
- Awarded Ms. Nicholson $150,000 + similar for other plaintiffs
In Re Nicholson, Judge Jack Weinstein ordered CPS:

- Produce English & Spanish brochures for victims describing resources & options;
- **Mandate caseworkers to *first* help victims get protective orders, shelter & counseling before taking children;**
- Stop charging victims with “engaging in dv;”
- Mandated DV training for all ACS staff; &
- Increased Ct-appointed counsel pay to $90 hr.
Judge Weinstein also ID’s model programs in his decision:

Judge Cindy Lederman’s *Dade County Dependency Court Intervention Project*:

*that emphasizes often best way to protect kids is to protect Mom;*

*provides immediate services to high risk parents & children.*
Calf. Cases charging Mom with “Engaging in DV” even when ALL abuse perpetrated by 1 partner:

(1) Mother and Carlos engaged in an act of domestic violence which involved "struggling" and Carlos pulling Mother out of a car;

(2) Mother and Carlos "engaged in domestic violence in the presence of the children;

(3) Mother and Carlos have "a history of violent behavior, which causes the children great fear and places their physical and emotional safety at risk";

E. Juvenile Family Violence Court

- San Jose, CA – Judge Eugene Hyman
- 1 Ass’t DA + 2 probation officers assigned
- Youth are on maximum level supervision
  = office + home visits & monthly court appearance

#408-299-3871
Ehyman@sct.co.scl.ca.us
V. Training

A. Early on realized we needed to TEACH:

- Dynamics of abusive relationships;
- Why women might stay or return;
- The impact of abuse on children;
- Why police & court interventions were necessary; &
- To ask, “How can we help you protect abuse victims?”
Draw a picture of the worst fight in your family that you can remember.
B. On-Going Training for:

- POLICE
- PROSECUTORS
- JUDGES
- DOCTORS + NURSES
- TEACHERS
- ADVOCATES
- ANYONE IN CONTACT WITH VICTIM or BATTERER or CHILDREN.
C. Some states now MANDATE training on domestic violence:

- Texas and Rhode Island mandate 8 hours of domestic violence training for all new judges and police officers, then periodically after that.

- But we applaud those states, like Arkansas, that require longer training.
VI. Class Actions


Action was brought against New York City’s police department, probation department & family court on ground that they had failed to protect & assist battered women.
Bruno v. Codd court found:

1. Showing that all defendants had not complied with their statutory duties precluded case dismissal.

2. Court has power to compel city police dept defendants to perform duty imposed upon them by law to exercise their discretion in reasonable, non-arbitrary manner.
3. Court said:

- “For too long, Anglo-American law treated a man's physical abuse of his wife as different from any other assault, and, indeed, as an acceptable practice.
- If the allegations of the instant complaint buttressed by hundreds of pages of affidavits are true, only the written law has changed;
- in reality, wife beating is still condoned, if not approved, by some of those charged with protecting its victims.”
4. Police officers

- called to the scene of a husband's assault on his wife, uniformly refuse to take action, even if the physical evidence of the assault is unmistakable and undenied;
- that, instead, they inform the battered wife that they are unable to render assistance or make an arrest, solely because the victim is the wife of her assailant; and
- that they advise that her only remedy is to obtain a protective order from the husband.
5. Probation Department employees

- in charge of the information desks and intake interviews at the various Family Courts fail to advise pro se battered wives seeking orders of protection of their right to an immediate petition for such orders.

- Instead, they merely assign conference dates to the petitioning wives often weeks or months later despite their pleas for immediate relief,

- without advising that such conferences are voluntary, and not a prerequisite for the obtaining of an order of protection.
6. Family Court petition clerks

- have, upon several occasions, denied petitioning wives timely access to the sitting Judge, and

- have abused their discretion in determining whether the wives' complaints are sufficient to warrant preparation of a petition.

- Based upon these allegations, the complaint seeks various forms of declaratory and injunctive relief against the respective defendants.
Bruno v. Codd Court said:

“The police owe a duty of protection to battered wives, in the same manner they owe it to any citizen injured by another's assault.”

*This provided basis for CONSENT DECREE to force police & courts to improve practices.*
A. WELFARE:

1. State payments are often the only safety net for victims, yet not enough to live on.

2. In N.H. in 1978, we brought buses full of poor women to the state capital to testify about their not being able to properly feed their children.

* We were successful in getting the welfare grant raised, but only by a small amount. Still, it was a huge moral victory for us!
B. Now working to de-criminalize survival welfare fraud

1. Most victims not receiving child support;
2. Vast majority attempting to properly care for children;
3. If victim must repay, allow *reasonable* time based on income vs. expenses, e.g. 4 yrs.
4. This started by our asking for meetings with Travis Co. District Attorney Ronnie Earle & he was receptive.
C. Job/ Career Planning

“Life Dream” Plan

1. Ask victim, “What is your life dream?”

2. Plan #1 - #10 how to make it happen.
D. What else does *this* victim need?

- Wheelchair?
- Car seat for baby?
- Crib?
- Refrigerator?
- Cash?

- [www.freecycle.org](http://www.freecycle.org)
E. Focus: How to increase safety?

Wrap victim & children in services... Whatever they need.
U. Of Tx. Survivor Support Network = Students & community volunteers assist victims with ANY need

- Fundraise to pay rent & other bills
- Help write resumes & find jobs
- Assist w budget & to access resources
- Find child care
- Provide rides
- (512) 232-7855
- www.utexas.edu/law/students
4 Alaska grandmothers transformed their court.

- by sitting in court & documenting practices
- by meeting with judges & prosecutors to discuss problematic practices
- by following up to ensure reforms held.
B. Community Safety Audit: Evaluate If Protecting Victims & Holding Offenders Accountable

- **Phoenix**: “DV & Systems Process Review” of Police Dept, City Prosecutor, Municipal Court & Family Advocacy Center (6 mos. in 2003);

- **Domestic Abuse Intervention Project** (Duluth, MN.) “Community Safety Audit Manual” #218-722-2781
VII. Domestic Violence Council
= great mechanism for reform

- Multi-disciplinary + monthly mtgs
  + food
- 3 Prong Approach to Problem-Solving:
  1. Honestly I.D. Problems
  2. I.D. Who Responsible for Change
  3. Create Action Plan

VIII. What do model strategies have in common?

1st Priority is victim safety
e.g. San Diego City Atty. Casey Gwinn’s Family Justice Center motto: WRAP THE VICTIM IN SERVICES.
A. Prioritize Abuse Cases

* Calif. Penal Code Section 1048 provides for calendar priority for
  
  - any case in which a child or elderly person is a material witness or victim,
  
  - as well as to cases of child abuse and sexual assault.
B. Model Programs are OBSESSED with Safety Planning

- Adult & Child Safety Plans
- www.abanet.org/domviol
- Not copyrighted
- Free!
Safety Plan = Action Plan to Stay Alive

- Safety in the home - change locks
- Safety in the street, driving, walking
- Safety at school, work, store
- Safety when fleeing
- Keep copy Prot Order with you at all times
- Get out of any room with weapons
- Ask for help!
C. Legal Aid for Victims

- [www.noahproject.org](http://www.noahproject.org)
  Abilene, Tx
- Medical & Bar Associations pay for lawyer housed in hospital
- Helps with civil & criminal cases
- Office above Emergency Room at hospital
- Hours 2 - 10 p.m.
D. Model Programs: 2\textsuperscript{ND} Priority is \textbf{OFFENDER ACCOUNTABILITY}

- This means from the 1\textsuperscript{st} contact, NO EXCUSES for his behavior
- Best way to help batterer is to hold him responsible
- AND best way to improve victim safety is to keep tight reign on batterer.
1. What does perp accountability mean?

- Treat crime same as if he abused a stranger
- GIVE MESSAGE ABUSE WILL NOT BE TOLERATED!
- Arrest, with probable cause
- Appropriate Bail/ Bond
- Pre-trial probation conditions
- Trial
- Sentencing with probation & check-in.
IX. Community Education

*plaster throughout community!
A. Safety Plan Brochures

- In the courthouse & police station waiting areas & bathrooms
- In libraries, schools, stores, laundromats, community agencies
- Offices of doctors, lawyers, professionals
- Distributed by police at every crime scene
B. “MEN CAN” Billboard Campaign

- FREE & not copyrighted
- Austin: on side of buses
- Philly: on billboards & posted
Juan and his brothers told their cousin that he was abusive and needed help.

**MEN CAN prevent family violence.**

For more information about what you can do to prevent family violence, call 267-SAFE. IT'S YOUR BUSINESS.
“MEN CAN” billboard campaign. . .
www.instituteforsafefamilies.org

- Download FREE
- Billboards + posters throughout the community.
*Victim Safety Must Be the Priority*

Remember SAFETY PLANNING at every contact.
XI. Resources

- Texas Council on Family Violence [www.tcfv.org](http://www.tcfv.org)
- National Coalition Against Domestic Violence [www.ncadv.org](http://www.ncadv.org)
Nat’l Council of Juvenile & Family Court Judge’s

- Resource Ctr on Domestic Violence, Child Protection and Custody
- Juvenile Justice Resource Center
- Technical Assistance
- Quarterly Journal, Monthly Newsletter

- 1-800-52-PEACE
- www.ncjfcj.org
Remember Our Goal Is to help child & adult victims escape & stay safe!
Thank you for being part of the solution!

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