Dual arrest in domestic violence investigations: a patrol officer perspective

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ABSTRACT

This study seeks to add to the dual arrest literature by incorporating the perspective of the patrol officer who is tasked with the decision to arrest one or more parties in the domestic violence or family violence incident. The research was conducted in the state of Connecticut, a state with consistently high levels of dual arrest. Four focus groups of patrol officers were conducted in an effort to explore their perspectives on dual arrest. The total number of officers was 20. Members of the focus groups identified several areas of concern, to include liability, communication of policy, time constraints during investigations, state law, suspect demeanor, the patrol supervisor, the field training officer, the specialized domestic violence unit, and the domestic violence docket court. Implications for policy and future research are included.

Keywords: domestic violence, dual arrest, primary aggressor, domestic violence, patrol officer

INTRODUCTION

The law enforcement response to intimate partner violence has changed significantly since the hands-off policies of the 1960s and 1970s. This evolution in police response has been driven by three interrelated historical occurrences. First, political pressure from the feminist movement and advocacy groups in response to nonarrest policies raised awareness of the severity of the problem of intimate partner violence and focused attention on the failure of police departments to intervene in assault incidents occurring in the family (Buzawa & Buzawa, 2003). Second, the risk of liability for the failure to arrest in an incident of intimate partner violence exposed states and municipal governments, along with individual officers, to the harsh realities of the informal response (Bruno v. Codd, 1979; Monell v. New York City Department of Social Services, 1978; Scott v. Hart, 1976; Sorichetti v. City of New York, 1985; Thurman v. City of Torrington, 1984). Finally, empirical research began to highlight mandatory arrest as the most effective police response to deterring repeat intimate partner violence. The Minneapolis Domestic Violence Experiment (Sherman & Berk, 1984a, 1984b) was a driving force behind nationwide adoption of mandatory arrest policies after the researchers concluded that arrest, as opposed to mediation or temporary removal of the offender, resulted in a lower recidivism rate of intimate partner violence. Replication studies (Dunford, Huizinga, & Elliott, 1990; Sherman et al. 1992; Hirschel, Hutchison, Dean, Kelley, & Pesackis, 1991; Berk, Campbell, Klap, & Western, 1992; Pate & Hamilton, 1992) were, at times, less convincing, yet mandatory and preferred arrest policies began to proliferate across the country and have since become the prevailing response for law enforcement.

As the number of these policies increased, another phenomenon was observed. The number of dual arrests began to grow (Frye, Haviland, & Rajah, 2007; Miller, 2001; Osthoff, 2002). This was clearly an unintended consequence of the policies and has led to an increased arrest of women (Buzawa & Buzawa, 2002), more often seen as the victims of intimate partner violence. Arresting victims subjects them to further victimization and has other potential consequences, to include job losses, custody rights, and an unequal distribution of justice.

Dual arrest in the state of Connecticut has received considerable attention from researchers because of its high rate of incidence. It has remained consistently high, with the modal rate being 20% from 2000 to 2012 (Cares, 2007; Gerstenberger & Williams, 2013; Gover, Paul, & Dodge, 2013; Hirschel et al., 2007; Peng & Mitchell, 2001; State of Connecticut Department of Emergency Services and Public Protection, 2000-2012). Collection of national data on dual arrests is sporadic, but previous research indicates Connecticut's rate is higher than most other states (Hirschel, et al., 2007). Much of the research attempting to explain this high rate has been quantitative, involving the analysis of data collected from the State of Connecticut Family Violence Offense Report. Quantitative data derived from official sources such as this invariably have potential limitations. The State of Connecticut Family Violence Offense Report, the primary source for incident-level data on dual arrest in the state, is no exception. Selection of variables is limited to those contained on the state-mandated form. In addition, there are limits to data interpretation due to the manner in which it is collected and categorized. The form also fails to provide the necessary social context and interpersonal dynamics involved in the police officer's decision to arrest one or both parties in an incident involving intimate partner violence.

This study attempts to address those limitations by assembling focus groups of patrol officers from police departments in southwestern Connecticut. This type of qualitative research

allows for a forum for officers to discuss dual arrest and has the ability to gain greater insight into the decision-making process of the patrol officer at the scene of the incident.

LITERATURE REVIEW

Research on Dual Arrest in Connecticut

Using National Incident-Based Reporting System (NIBRS) data from calendar year 2000, Hirschel et al. (2007) researched dual arrest in a national study. The authors found that dual arrest was more likely in states with mandatory arrest laws than in those with preferred arrest laws. Overall, dual arrest rates in the states included in the analysis were relatively low with the exception of Connecticut. The authors found that Connecticut, a state with a mandatory arrest law without a primary aggressor provision, had dual arrest rates over seven times the national average.

The Department of Emergency Services and Public Protection, publishes annual reports of family violence arrests, to include dual arrest rates. Rates have remained remarkably consistent over the past 10 years, averaging 20% over that period of time. There have been studies analyzing the dual arrest data in an effort to determine its nature and characteristics (Cares, 2007; Gerstenberger & Williams, 2013; Hirschel et al., 2007; Martin, 1997; State of Connecticut Department of Public Safety, 1991). Variables such as evidence of injury, establishment of independent probable cause, assaulting or interfering with a police officer, and violation of a protective order were among those cited by police officers as affecting the arrest decision.

Connecticut Statutory Law

The state of Connecticut enacted a mandatory arrest statute for family violence offenses on October 1, 1986 (Connecticut General Statutes, P.A. 86-337). The statute directed police officers not to base their arrest decision on either the victim-offender relationship or whether the victim wanted the offender arrested. It also directed police not to discourage requests for law enforcement intervention by threatening or suggesting that both parties would be arrested. In the event that complaints were made by opposing parties, police were to evaluate the complaints separately in making the decision to arrest or seek an arrest warrant. There is no primary aggressor provision in the statute.

As part of the same legislation, police departments were required to develop and implement guidelines for arrest policies in family violence incidents. The Municipal Police Training Council (MPTC), now known as the Police Officer Standards and Training Council (POSTC), was also required to establish an education and training program for police officers and state attorneys.

Effective October 1, 2004, new legislation added language to the family violence statute concerning use of force as a means of self-defense. Discussion that preceded the enactment revolved around the high rates of dual arrest that were occurring in the state. In fact, the statement of purpose was to establish considerations to be made by a peace officer prior to arresting more than one party to a family violence incident. The act was aptly entitled, “An Act Concerning Dual Arrests in Family Violence Cases” (P.A. 04-66). Although Connecticut law has always allowed the use of force in self-defense, its application to force used within intimate

partner violence incidents has been less clear, particularly as it is interpreted by police officers. In her study of dual arrest in Connecticut, Martin (1997) reported that police and prosecutors strictly adhered to the mandatory arrest provisions of the law, relying on probable cause in effecting arrests. For the most part, introduction of self-defense into the calculus was left for the court to decide post-arrest. The newer statutory language reads as follows…"when a peace officer reasonable believes that a party in an incident of family violence has used force as a means of self-defense, such officer is not required to arrest such party under this section." Although still bordering on the equivocal, the new statute does reinforce the point that self-defense can be considered in the decision to arrest. Newer statutory language mandates development of model policies for Connecticut police departments. The state and several partners developed such a model policy, reported in its Police Response to Crimes of Family Violence: Model Policies, Procedures and Guidelines (Office of the Chief State's Attorney, Police Officer Standards and Training Council & Connecticut Coalition Against Domestic Violence, 2012). .The model policy has a separate section on dual complaints and assessing the individual complaints. In addition, there is a discussion of self-defense and its consideration in the investigation.

METHODOLOGY OF CURRENT STUDY

Selection of Focus Group Officers

To address quantitative data limitations and improve the understanding of the reasoning behind dual arrest decisions, focus groups of patrol officers were assembled. Six police departments in southwestern Connecticut were asked, through high ranking supervisors, to provide a representative sample of patrol officers for participation. The officers were separated into four focus groups, consisting of 4 to 6 police officers each, and were conducted at four police departments in January, February, and March of 2009. The total number of patrol officers participating in the research was 20. The focus groups were conducted in conference rooms with only the principal investigator and the patrol officers present. Although police supervisors facilitated officer selection and handled logistics, they were not present in the room when the focus groups were conducted. The participants were patrol officers and had varying levels of experience in the investigation of intimate partner violence. Focus group sessions were approximately one hour in length. All officers who participated were on duty.

Informed Consent Procedures

Once officers appeared for their designated focus group, they were given a consent form that explained the nature of the research, the risks and benefits of participation, and assurance that their responses would remain confidential. Officers were also provided with contact information for the principal investigator in case questions or concerns arose at a later date. All participating officers signed the consent forms. To insure confidentiality, no demographic information was collected on the participating officers. References within this chapter to specific officer quotations do include general descriptive information, particularly as it relates to department size, officer gender, officer race/ethnicity, and officer seniority. Reasonable efforts were made to prevent the attribution of a specific quote to an individual officer. Researcher field notes are the only written records of the focus groups. No video or audio recordings were made.

These steps were put into place to insure confidentiality and increase the comfort level of officers during the focus group discussions.

Interview Questions

A structured set of questions (Appendix A) was presented to each of the four focus groups. Discussion flowed from those questions and eventually led to explanations for dual arrest in addition to those included in the questions. Again, the goal of the focus groups was to probe the minds of the police officers to better understand the social mechanisms that lead to dual arrest in incidents involving intimate partner violence.

FOCUS GROUP RESULTS

Aware of the history of the law enforcement response to domestic violence, it is appropriate to begin the write-up of the focus group results with an officer quote.

> "Arguments between two people, even if there is minor physical contact, are private business. You hope that you won't have to make an arrest once you get there. It's usually not the kind of call we should be going on."

The officer who made the comment was male, white, from a larger department, and had what would be described as low seniority. A comment like this suggests that there is still reluctance on the part of some police officers to consider the crime of intimate partner violence as worthy of police investigation (unless it rises to a particular level of severity). His remark seems to be a remnant of the "hands-off" policies of the past, where violence between intimates was deemed to be a personal matter and outside the scope of a police officer's duties. In discussing this comment within that particular focus group and others, the prevailing sentiment was much different. The majority of officers showed little support for the comment and felt that the intimate partner violence incident deserved the same level of investigation as any other criminal investigation, regardless of severity. The reaction of other focus group officers indicates that attitudes have changed for many police officers. What seemed evident was a realization that intimate partner violence was a crime deserving of police intervention. For many, there was genuine concern for the victim, yet awareness that it was often difficult to assign blame and establish probable cause because of conflicting evidence. An officer noted:

> "No one deserves to be treated badly and we should do everything we can to make sure that doesn't happen. Sometimes it is hard with these types of cases, though. You don't always have a lot to go on. It's he said, she said. You do what you can to be fair."

Factors Influencing the Arrest Decision

In response to the question surrounding major factors influencing the decision to arrest, probable cause was, in most officers' eyes, the most critical factor in determining whether to arrest one or both intimate partners. Most officers expressed the view that arresting both parties should depend upon establishing independent probable cause. A senior officer from a larger department commented:

> "It's your job to individually assess each case for probable cause. You look for evidence of a crime. Probable cause gives me what I need to arrest someone. That means one or both people. If both need to be arrested, they will be."

If the investigation failed to yield the evidence necessary to make that determination, there should be a reduced likelihood of dual arrest. Responding to the scene and conducting a full investigation, complete with interviews and evaluation of the physical evidence, was necessary in establishing that probable cause. Evidence such as physical injury and property damage were keys in determining whether to arrest one or both parties.

Responding multiple times to the same address and knowing the history of violence in the home was also seen as an important predictor. Officers were in agreement that an arrest was likely if there was past violence, particularly past violence involving injury. An officer noted:

> "It's a good bet that I'm going to make an arrest if I've been to the home before and there has been domestic violence. If I know someone was hurt before, I'm going to remember that. I don't forget things like that. "

When asked about the relationship to dual arrest, the consensus was that repeat calls would have an increased likelihood of dual arrest. When asked why it might lead to more dual arrests, some officers said that it could be the frustration of continually responding without a resolution. Others felt that repeat calls often have escalating levels of violence and that the independent probable cause noted above is easier to establish in those incidents.

Liability

Liability was a recurring theme in the focus groups. Most officers were aware of the potential to be held liable for failing to act, yet there was a difference of opinion about how that actually impacted the arrest decision. One officer said that she had watched a documentary on the Tracey Thurman case while at the police academy and that she was fully aware of the liability issue. She noted that the film had a tremendous impact on her, despite the fact that she had been out of the academy for many years. The realization that a municipality and an individual officer could be held liable for a failure to act impacted on her decision to conduct a thorough criminal investigation. She was less clear as to how it actually affected her arrest decision. She stated that it still boiled down to establishing probable cause, but that her confidence in making the right decision was buoyed by conducting a comprehensive investigation.

Another officer, a racial minority with a great deal of seniority, made the following comment that seems to reflect some of the concern with the liability issue:

> "You have to be sensitive and have an open mind. Don't be biased towards the man or the woman. If you fail to apply the law as required, you expose yourself to liability. They say that you are protected when you arrest based on probable cause, but you never really know."

Tied to the liability issue was the presence of state law and departmental policy in mandating arrest. One older officer, white and from a smaller department, with a great deal of experience in responding to domestic violence, made the following comment:

> "Our policy has made my job much easier. I know what the law is with regard to family violence and our department's policy mirrors that law. I feel like it sometimes limits my options, but it does protect me from a lawsuit. I don't really think about the policy when I am investigating this kind of call, but at least I know that it is clear."

The officer's comment is somewhat conflicted in that he feels comforted by the fact that his liability is reduced, yet not always happy to have policy or law that limits his decision making. When he was later asked how it actually impacted arrest, he said that it probably increased its chance, to include dual arrest. It would force an arrest in some incidents where he might feel a better option existed.

Changes in departmental policy are communicated to officers in varying forms. According to the focus group officers, many departments now communicate policy changes through their municipal e-mail accounts. In many cases, officers are eventually required to sign a form attesting that they read the policy or legal update and that they understood it. When asked if they received any actual training on the new policy, many officers answered that they had not. Some officers indicated that their departments handed out written copies of policy amendments and legal updates at roll call. Supervisors were supposed to be well-versed on the issues and the intention was for them to conduct training in those areas. For many of the officers, however, that discussion did not occur and there was no genuine effort to address any potential misunderstandings or misinterpretations. One officer made the following comment:

> "You go to line-up and they pass out the new or revised policy. No one explains it and no one makes sure that everyone understands it. You are really on your own to interpret it."

Another officer, commenting on the use of departmental e-mail to communicate policy changes, stated:

> "I think the system could work. We try to take advantage of the technology that we have. The problem is that a lot of officers don't read the stuff, including the supervisors. Sometimes they are acting based on outdated policies and that's a problem."

Some differentiation between officers from small and large departments appeared to exist in this regard. Officers from smaller departments had more positive comments about the communication of policy change than those from the larger departments. An officer from one of those smaller departments commented:

> "We talk about any changes in our policies and laws. I think our administration makes a real effort to get us updates. It's important to have this information and we do a better job when we have it."

Time Constraints During Investigations

Some officers working in what would be considered busier police departments and municipalities cited the inability to devote the necessary time to conduct full investigations. They indicated that running from call to call did not afford them the time to carefully investigate, but there was disagreement about the impact that a shortage of time had on their decision to arrest. A few officers felt that it would result in more dual arrests, based on the inability to devote the time to establish independent probable cause. A few officers called attention to the misdemeanor summons, a "paper" arrest where no custody is required. Officers might be more inclined to issue a misdemeanor summons to both parties to quickly resolve an investigation, particularly if the incident did not involve physical violence or injury. With no need to transport and process a custody arrest, officers would be free to clear the call and be available for a new assignment. Other officers felt that the pressure to move on to the next call would result in fewer findings of probable cause and, subsequently, fewer arrests, both single and dual. One possible outcome was reclassifying the call to something other than a domestic incident. By notifying communications personnel of that fact and writing up the report to reflect the change in classification, there would be no mandate to arrest. A divide clearly existed between more and less senior officers with regard to the impact of increased call volume. The more senior officers felt that their years of service allowed them the ability to conduct full investigations and not be pressured to compromise an investigation, particularly a complicated one involving intimate partner violence. The more complete investigation, in their mind, would result in fewer dual arrests because the culpable party could be identified. Less senior officers, on the other hand, were more sensitive to the pressure to move on to the next call and felt it could compromise the investigation, resulting in more dual arrests. An officer with low seniority commented:

> "Things can get really busy out there. There are nights when you are bouncing from call to call without much of a break. When that happens, you want to do your part. We all count on each other. I'm not saying that you'll do less when you go to a domestic violence call, but you've got to pull your weight. That's the reality of it. If it's jumpin' out there and you've got two people with conflicting stories, you might be more inclined to give them both summonses. I mean, you still want to make sure you don't put anyone at risk, so you'll take a hard look at that. I don't want to see anyone get hurt. If you're satisfied, then a summons serves the same purpose has a custody arrest. You can finish up the call and move on to the next one."

Incident Seriousness

The participants reported mixed reactions as to whether crime seriousness was a predictor of dual arrest. The majority of officers felt that it was secondary to establishing probable cause for arrest. There was acknowledgement, however, that probable cause was much more difficult to establish in less serious crimes. This was often related to the fact that no visible injury to either party was evident. Without observable signs of injury, officers were left to evaluating verbal accounts of the incidents from both parties, interviewing witnesses (if any), and documenting evidence such as property damage. The more serious incidents, which occurred much less often, usually involved visible injury to one or both parties, making the establishment

of probable cause much easier. In the event that only one party was injured, it was easier to identify a victim and an offender, reducing the likelihood of dual arrest.

Spousal and Nonspousal Relationship

Officers were briefed on the results of the quantitative research relative to more dual arrests occurring in spousal relationships than in nonspousal relationships. The police officers were unanimous in expressing that the relationship of the parties had nothing to do with the arrest decision. One officer commented:

> "The law protects equally. It does not distinguish between spousal and nonspousal relationships. The relationship has nothing to do with the legal issue or the decision to arrest."

Many officers, particularly those from larger departments, made the point that nonspousal relationships were becoming much more common, partly attributable to the rising Latino population in southwestern Connecticut. A consensus of officers indicated that domestic violence incidents in the Latino community typically involved nonspousal partners. Further, the officers suggested that there were cultural differences in the acceptance of domestic violence, with greater acceptance by the Latino community. Some officers predicted that this would eventually result in a higher percentage of dual arrests in nonspousal relationships for that ethnic category. A female minority officer noted:

> "We're arresting more and more Latinos for domestic violence. A lot of times they're not married. Violence in the home is part of their culture and that's not going to change overnight. I think we'll see more arrests, both single and dual, in the short term."

One female officer discussed the complexity of the marital relationship and the commitment that went with that complexity. She said that she could understand the increased number of arrests in marital relationships. First, they are less likely to have somewhere else to go because they shared a home. Second, the marriage signaled a greater commitment to the relationship, making them less likely to attribute blame and threaten the investment made in that relationship. There was less agreement on this interpretation. Other officers felt that the nonspousal relationship was becoming more and more common and that differences in levels of commitment between spouses and nonspouses were likely converging.

One officer called attention to the dating relationships and felt that they may account for some of the differences in single and dual arrests between departments. He said that the family violence statute did not mandate arrest in a dating relationship as it did in the other relationship categories. He was aware that departments differed in their use of arrest with regard to people who were dating. His department was less apt to classify a dating relationship as family violence if only one or two dates had taken place. In his mind, this had an end result of fewer arrests, both single and dual. He was aware that other departments classified any dating relationship, regardless of the number of dates, as family violence. This would have the effect of increasing the number of single and dual arrests (still dependent upon the establishment of independent probable cause), particularly in incidents involving the threat of violence. Simply looking at statistics would make it appear as if one department was involved in more domestic violence

investigations and making more arrests as well. Thus, policy can have the effect of increasing dual arrests by increasing the number of incidents classified within the domain of domestic assault.

Self-Defense

When officers were asked about self-defense, they were largely aware that it was part of the statute and that they could consider it when determining probable cause to arrest. Several officers, however, acknowledged the difficulty in determining when physical contact was a product of self-defense. One officer made the following comment:

> "I look to see if there was a possibility of retreat. Was there any open space where that person could have retreated to or were they boxed into a corner with nowhere to go? If there was open space and that person did not retreat, it would be difficult to justify it."

The law in Connecticut relating to self-defense is somewhat ambiguous when it comes to retreating within one's home, particularly in the investigation of an intimate partner violence incident. There is no duty to retreat in the home, but that does not apply to the person who is the initial aggressor. Further, identification of the primary aggressor is not part of the family violence statutory language in Connecticut, but it is important in determining whether a party to a family violence incident can claim self-defense. This is an area of confusion for many investigating police officers and is borne out in the comment above.

Primary Aggressor Language

Some discussion occurred about the need for primary aggressor language in the state statute and whether they thought it would reduce the number of dual arrests. While no general consensus existed among the officers, all were familiar with the term. Many of the officers stated that they already made conscious efforts to identify the primary aggressor, although some of the obstacles already noted occasionally stood in their way. No negative feedback was given when it was suggested that primary aggressor language should be a part of the current family violence law.

Several officers noted that women had become more aggressive in the last few years and, in some cases, had learned how to manipulate the system. For example, it was noted that those who repeatedly called the police learned what to tell the call taker and the responding officers. They understood the requirements of probable cause and said the right things to insure that the standard was met. Although not expressed by the majority of officers, the increasing aggressiveness of females was offered by some as an explanation for the higher number of dual arrests.

Suspect Demeanor

A spirited discussion took place in some of the focus groups about suspect demeanor, particularly female demeanor, and its impact on the arrest decision. One junior officer made the following comment:

> "When you go to the scene, especially those where you've been before, you definitely are influenced by people mouthing off. When they disrespect you, you have a tendency to take them in. A lot of times, that's why the woman goes."

This prompted an exchange between officers about the role of suspect demeanor in the arrest decision. A more experienced officer from a large department countered that he did not agree with arresting a woman simply because she mouthed off and that the arrest should be based on the probable cause established at the scene. Despite this comment, the officers still came to a general agreement that dual arrest was less likely when the parties were cooperative with the responding police officers. Disrespectful or hostile demeanor, an extralegal factor, was clearly a challenge to officer authority and could easily lead to arrest, both single and dual.

The Patrol Supervisor

Another potential predictor of dual arrest that arose from the focus groups was the influence of the first line supervisor (patrol sergeant). A number of officers cited the inexperienced or overly cautious patrol sergeant as having the potential to increase the number of dual arrests. The consensus was that inexperience, combined with the fear of litigation, allowed little flexibility in dealing with these types of incidents. The increase in dual arrests was explained as an attempt to err on the side of caution. This was more evident in those incidents where there was difficulty in determining independent probable cause. A senior officer made the following comment:

> "That young supervisor may have that CYA (Cover Your Ass) attitude and actually encourage dual arrest. He believes running everyone in protects him and the department from liability. It goes hand-in-hand with the mentality that the court should be responsible for getting to the bottom of it. That doesn't make any sense. It's the easy way out. I think a full investigation is warranted when you have conflicting evidence and counter-complaints. You don't just throw up your hands and hope someone else figures it out."

Several participants expressed their displeasure with meddling, micromanaging supervisors, but indicated that it did not affect their decision to arrest. Some of the more senior officers who shared that view did say that if a supervisor was persistent and demanded a dual arrest, they asked that supervisor to take over the investigation and handle the rest of the investigation, including the arrest decision. That would usually convince the "meddling" supervisor to back off and allow the officer to take charge again. The supervisor that would most likely fit into that category was one who was recently promoted.

Continuing the discussion of the influence of the first line supervisor, one officer explained:

> "There are times when you go to a domestic violence scene and you have a gut that a crime didn't occur. You have two people who are verbally abusive and some of the language is perceived as threatening. When you sit everyone down, you find that it was blown out of proportion. You're comfortable with classifying the call as a verbal, not a domestic. You feel no one's actually been threatened and you can leave feeling

> everybody's safe. Then, a supervisor shows up and takes an entirely different position. He's inflexible and says an arrest has to be made because there's been a threat of violence. You've done the investigation and you know no crime was committed and no purpose is served by arrest. Well, that supervisor feels much differently and mandates an arrest. You're stuck because he's running the show."

Interestingly, what made that supervisor inflexible proved to be elusive. The officer who made the comment said that it was probably experience, but that there were also seasoned supervisors, albeit fewer in number, who exhibited the same inflexibility. Much of the rigidity seemed to relate back to the fear of liability.

Another aspect of supervision that was raised concerned the failure of some first line supervisors (sergeants) to keep current on the family violence laws and policies. Several officers acknowledged that a number of changes were made in the laws over the past twenty years and that a few senior sergeants continued to operate under outdated laws/policies. There was little agreement in the focus groups as to whether that was due to resistance to the changes or lack of knowledge. Some of the conversation shifted toward the mentality that dual arrest had once been a preferred disposition in certain departments and that those senior sergeants continued to support that mentality. This would certainly point toward resistance. There was, however, a consensus that most supervisors, particularly those with less seniority, were aware that the current laws and policies discouraged dual arrest.

Arrest for the Purpose of Forcing Resources

Invoking the criminal justice process to resolve problems in the intimate relationship was another area of discussion. Some officers felt strongly that arrest should not be used as a vehicle to provide resources and services to intimate partners. For them, arrest needed to be based on probable cause that a crime was committed, not on whether a couple or family would benefit from services. They were cognizant of the need for services and the subsequent benefits, but felt that there were many other methods to deliver services without arrest. They also acknowledged the challenges that children presented. When children were present or involved, it was more difficult to avoid arrest. Children were seen as innocent victims and those same officers felt an obligation to provide for their safety. Arresting for the purpose of bringing in social services for those children became a much greater possibility. However, a number of officers felt frustrated by repeat calls for service at the same household, regardless of the presence of children, and thought that arrest would bring much needed resources for all involved. The general consensus was that this would result in more dual arrests.

Field Training Officers

Several officers, experienced and inexperienced, referred to the influence of the field training officer on the decision to use dual arrest. In the state of Connecticut, officers must complete 400 hours of field training after graduation from the police academy in order to become certified. Those 10 weeks are spent with one or more field training officers from the employing agency (certified as such by the state of Connecticut's Police Officer Standards and Training Council) who are responsible for training and evaluation. Who the field training officer was and

how they prioritized the various police responsibilities seemed to be critical to many of the focus group officers. One officer noted:

> "If you did most of your field training with a motor vehicle guy, there is a good chance you'll do the same. On the other hand, if your FTO was big on domestic violence, you probably would take that on as a priority and learn how to do it right."

Many departments actually rotate new hires between several field training officers so that they are exposed to a variety of policing styles and specializations. Despite that rotation, many of the focus group officers felt that they connected with one particular field training officer and that his or her priorities would have an impact on their future policing style.

Domestic Violence Docket Court

Little discussion took place regarding the influence of the domestic violence docket court on the decision to arrest. Most officers felt that the court process, including the docket court, had a minimal impact on their domestic violence arrest decision. In their minds, the docket court was an asset after arrest in providing services for those in troubled relationships. Forcing services on reluctant partners was in the back of some officers' minds, but they maintained that establishing probable cause for the arrest was foremost in their arrest decision. Many officers agreed that the creation of a domestic violence unit, which often coincides with the docket court affiliation, might reduce dual arrest. Initiatives such as reviewing officer reports by the domestic violence unit might lead to more effective report writing and better incident investigation. As mentioned before, many participants also believed that a complete investigation would reduce the incidence of dual arrest.

Family Violence Offense Report

Focus group officers were asked about the Family Violence Offense Report (Appendix C) and whether they were comfortable with its format or thought it needed revision. The main frustration concerned entering the number of weapons used, which was reported to have nothing to do with the arrest decision. Relationship categories occasionally proved confusing, particularly the situation where an unmarried couple was living together. Officers were not consistent as to what category was appropriate for that relationship (dating category or persons who are presently living together category). Overall, officers were accustomed to filling out the form as part of the required paperwork and did not think it was difficult or cumbersome to complete.

More often than not, officers felt that they operated autonomously when investigating intimate partner violence. This allowed them to take the time to fully investigate the incident and exhaust all possibilities before engaging in a dual arrest. This included assessing and treating injuries, determining who called in the complaint, checking for prior court orders, interviewing witnesses (including children who might be present or involved), and interviewing each party separately. There seemed to be a clear mandate that the dual arrest should be avoided.

DISCUSSION AND POLICY IMPLICATIONS

One of the issues raised by focus group officers was the effect of suspect demeanor on dual arrest. Although Klinger (1994) disputed the notion that suspect demeanor was responsible for an increase in arrests, other researchers have found evidence to the contrary (Worden & Pollitz, 1984). Suspects who present affronts to authority are seen as disrespectful. Although there was not a consensus that an uncooperative victim might be more likely arrested, several younger officers said it did increase that risk. Domestic violence victims may perceive that they are not being treated justly, reacting with what the officer deems to be disrespect. If suspect demeanor is a predictor of dual arrest, it would stand to reason that less experienced officers would be more inclined to use it when their authority was challenged. Their experience in dealing with people in volatile situations is limited and they may therefore overreact when challenged. The senior officer should be better equipped to engage the person verbally.

Again, this is where training and knowledge of domestic violence comes into play. Officers need to allow, to a certain degree, victims to vent without being subjected to arrest. This is difficult for many officers to swallow because it is a challenge to their authority. The domestic violence incident is traumatic and not all victims react in the same manner. Officers should be aware of this fact and have the patience to allow the purging of built-up frustration. Training should also provide the skills to de-escalate a potentially violent reaction. Both may result in the reduced use of dual arrest. Interestingly, focus group officers, particularly those who were less senior, felt that the influence of a field training officer (FTO) impacted handling of domestic violence calls. Officers who were trained by an FTO who had a motor vehicle background were more likely to focus on motor vehicle law, while those who were trained by an FTO who emphasized domestic violence investigation seemed more capable with those types of incidents. Many departments attempt to avoid this problem by rotating new officers among a group of field training officers. This exposes that officer to a variety of policing styles and personalities, making identification with one officer less likely. Despite rotation of field training officers, some focus group officers felt that one influential officer could still have long-term effects on policing priorities. This certainly calls attention to the fact that younger officer are impressionable, making selection of FTO's a critical management decision. Candidates for the position should be screened to insure that well-rounded officers are selected. Their training should include the importance of conveying the same message to their trainees: well-rounded officers are preferred. Field training officers should also be compensated fairly as they are evaluating probationary police officers, a key task in the development of an effective police force. Fair compensation should increase the pool of prospective field training officer candidates.

Continual review of state law and departmental policy is critical. Relying on police officers to read and interpret law and policy changes may not suffice. Focus group officers raised this issue on several occasions. There needs to be an improved mechanism for insuring that officers actually understand those law and policy changes. Face-to-face interaction between officers and supervisors to discuss law and policy changes appears to be a wise investment in time and resources. The fairly consistent response of the focus group officers was that leaving it to line officers to read and interpret these changes does not work. Since the roll call still prevails in most departments, this may be one of the few locations and opportunities for this training to occur (absent formally scheduled trainings). It allows for an exchange between a supervisor who should understand the policy or law and the officer who ultimately has to apply it in the field. Intimate partner violence is a complicated criminal investigation and officers need training to

apply the optimal response. Whether it is reviewing existing statutory language, evaluating completed investigations, or participating in role-playing exercises, officers should learn the skills that will allow them to effectively intervene in incidents involving intimate partner violence.

Domestic Violence Docket Court

One particularly interesting area of research would be to determine if the use of dual arrest was reduced in municipalities where a specialized docket court was introduced. That exact situation has occurred in Fairfield County, Connecticut. Four of the municipalities included in this research that did not have a docket court in 2005 now have one. It is an ideal situation in which to assess the impact of the docket court with pre- and posttest measurements of domestic violence arrests. Similarly, as the docket court becomes more entrenched in the judicial system, it will be important to assess the impact of existing docket courts, possibly using similar time series designs. In addition to the docket courts, it would be prudent to expand the list of variables. For example, has the family violence policy changed during the study period or has the training for police officers been enhanced?

Officers from police departments that are serviced by such courts could have a better grasp and appreciation of the dynamics of intimate partner violence. Concerted efforts must be made to integrate the docket court with police departments so that patrol officers who investigate these incidents realize the benefits they provide. Some of the focus group comments indicate that officers do not fully recognize those benefits and see the specialized court as merely providing post-arrest services that reluctant couples would otherwise not volunteer to receive. This can be facilitated by joint trainings, a specialized domestic violence unit, a court liaison officer, or the active involvement of the prosecutorial staff with police investigations. Having victim advocates from the docket court actively working with the police department has the potential to show patrol officers the impact their decisions have on the victims of domestic violence. As with the training noted above, increased awareness has the potential for more effective and fair criminal investigations with consideration for all involved parties. For the purposes of this research, the net result should be a reduction in dual arrests, placing Connecticut more in line with the rest of the country.

Statutory Language: Primary Aggressor Law

From a legislative perspective, it may be time in the state of Connecticut to adopt a family violence statute that includes primary aggressor language. This type of language provides guidance to the officer to help distinguish the offender from the victim in an incident involving intimate partner violence. In theory, it encourages the investigating officer to be less incident-driven and more attuned to the broader context in which the violence occurs. Considerations in determining the primary aggressor vary by statute, but include comparative extent of injuries, threats of future harm, prior history of violence, and self-defense. The importance of this language is shown by its adoption in 24 states as of calendar year 2000 (Hirschel et al., 2007). Current statutory language in Connecticut does not include the requirement to identify a primary aggressor, nor does it provide clear direction to the police officer on factoring self-defense into the arrest decision.

Primary aggressor language has not proven to be the magic bullet for reducing intimate partner violence. Finn and Bettis (2006) used domestic violence scripts to explore officer justifications for dual arrest in a preferred arrest jurisdiction with primary aggressor language in the state statute. Despite the fact that the statute instructed officers on factors to consider, not one of the officers weighed all of the factors in their decision- making process and not one officer mentioned self-defense. The overriding concern was the risk of future violence. The authors noted that officers were incident-based (act-based) in their investigation and failed to consider the backdrop of the violence, even though mandated to do by state statute.

Specialized Domestic Violence Units

Police departments should also consider the formation of a domestic violence unit in order to improve their response. Their responsibilities vary and can include referral, training, review of patrol reports, risk assessment, investigation, home visits, arrest, liaison with outside agencies, data analysis, community education, and policy advisement. Future research should focus on evaluating their effectiveness and establishing the appropriate outcome variables for measurement.

Although research in this area has been fairly sparse, some research indicates that a domestic violence unit can have a positive impact on the police response. Bledsoe, Sar, and Barbee (2006) studied a coordinated community response to intimate partner violence in Jefferson County, Kentucky that included a specialized domestic violence unit. They found that the unit, comprising only 1.6% of the sworn personnel in the department, accounted for over 35% of the arrests for intimate partner violence.

Conviction rates for the specialized unit arrests were higher than the rates for the patrol division, although the difference was not statistically significant ($p=.054$). Average jail sentences were longer, indicating greater accountability for offenders. In addition, officers assigned to specialized unit were able to devote the necessary time to conduct investigations, allowing for evidence-based prosecution. Policy implications that were identified by the authors included additional training and development of expertise in investigative techniques.

Not all of the research has shown that the units have been effective in reducing domestic violence. Farrell and Buckley (1999) studied a domestic violence unit in Great Britain, focusing on repeat victimization as their measure of police performance. The research produced mixed results, with repeat calls declining in the experimental division, but repeat calls to chronic case households (eight or more calls during the study's time frame) increasing or remaining constant. The authors suggested that the unit may have had a greater impact on the less entrenched cases of domestic violence. The authors recommended that specialized units focus on chronic case households to increase their effectiveness and efficiency. It may be that the chronic case household should be the focus of specialized units because the risk of repeat violence is greater. Future research of these units should evaluate the different strategies utilized and assist in formulating best practices.

What these units may also allow for is a continuing change in the culture surrounding the police response to intimate partner violence. Assigning officers who are specially trained in domestic violence and allowing them to work in that capacity may send a message to other officers in the department about the commitment of the organization to that particular crime. As part of a comprehensive strategy demonstrating organizational commitment (including policy amendment and training), this specialized unit appears to have promise in reducing the incidence

of domestic violence and improving the overall police response. It is certainly an area ripe for additional research, particularly with the economic pressures facing state and municipal agencies. Formation of a domestic violence unit can be a sizeable investment in personnel in economically lean times for state and municipal agencies. With the current pressures to reduce expenditures, any significant changes must demonstrate evidence of their effectiveness to justify allocation of resources.

Data Collection: Family Violence Offense Report

The research has identified shortcomings of the Family Violence Offense Report, the primary method of collecting data on intimate partner violence in the state of Connecticut. In fairness, a great deal of critical information is collected on the form pertaining to family violence. There also appears to be a genuine effort to address problems with the form and revise it when necessary. For instance, the version of the form used for this research (rev. 09/00) had an entry for alcohol (identified as liquor on the form) and drug involvement in the incident. Officers could check one of three possible response categories: yes, no, or unknown. Other than in a narrative, officers could not attribute the alcohol or drug use to any particular person involved in the incident. This limited the ability to assess the impact of alcohol or drugs on the incident unless the narrative was read. Knowing that they are involved is certainly critical to understanding the violence, but even more critical is who used the alcohol and drugs and how that use might be related to the violence. In fact, this limitation was identified in previous research on dual arrest by Martin (1997). In a 2007 revision to the form, the same three response categories were included, but the officer now has the ability to check whether each person identified on the form had liquor or drug involvement. This adds more accurate information about the influence of alcohol and drugs in the incident. It may allow researchers to delve into the influence of alcohol and drugs as a predictor of violence and assess its impact on offenders, victims, and children. This is a substantial improvement.

Another suggested improvement to the form and one that would significantly improve the ability of researchers to study intimate partner violence is the recategorization of relationship codes. Connecticut's form is an attempt to collect information on family violence, which includes much more than what is described in this research as intimate partner violence. As an example, the form collects information on roommates (non-intimates) and relatives residing in the same home and outside the home. For the most part, categories are mutually exclusive and focus group officers were not particularly confused on the categorization of a relationship. One exception was noted and this exception points to the need to separate intimate partner violence from other forms of family violence (relatives, other family members, etc.)

The categories for relationship codes on the current Family Violence Offense Report are: A. spouse; B. former spouse; C. other relative residing in the home; D. other relative NOT residing in the home; E. persons who are presently living together, have lived together, or ever had a child together; F. persons in, or who have recently been in, a dating relationship.

Categories A, B, and F are clearly intimate partners and were the categories included in this research. Categories C and D, populated by non-intimates, were excluded from this research. Category E, however, is too broad in scope and is populated with couples who are both intimate and non-intimate partners. For instance, two people who have ever had a child together should be categorized as intimate partners, yet they are included in a category along with non-intimate roommates. People who were never married but who currently live or had ever lived together

could also be placed into that category. As confirmed by some focus group officers, a couple in an unmarried, cohabitating relationship might not be considered as dating and be placed into category E because they were seen as persons living together. For this research, that entire category had to be eliminated from the dataset because there was no way to separate intimate and non-intimate relationships. Because category E contained such a large number of incidents (n=1,083), it would have been preferable to include the percentage of those incidents in that category that involved intimate partners (see discussion in Appendix F footnote, pages 170-171). Recategorization would allow inclusion of those incidents where intimate partners were involved. The recommendation is that an additional category be created to capture those intimate partners who had children together, but were never married. In addition, it would be helpful to define the dating relationship so there is no confusion in that area. An example of the present confusion was raised by a focus group officer who commented that differences in family violence arrests between police departments might be explained in part by their interpretation of the dating relationship. According to that officer, his department included fewer dating relationships because a first date might not be included as a family violence incident. Another department might include a first (or second) date as family violence and report the incident accordingly. There was confirmation of this differing interpretation from a supervisor from one of the larger municipalities whose department did not include violence on a first date in the family violence statistics. Standardization must be designed into the process to insure that officers and departments are reporting information to the state as consistently as possible.

LIMITATIONS

Two obvious methodological limitations to this research are the small sample size and the manner in which it was selected. Twenty officers does not allow for generalizability. Additionally, it was not a random sample of patrol officers, but a convenience sample based on its selection by supervisors. Future research in this area should utilize larger, randomly selected samples. This would improve the understanding of the decision-making process behind dual arrest and allow for more informed policy making in this area of criminal law.

CONCLUSION

Explaining the high dual arrest rates in the state of Connecticut is critical, particularly if one of the consequences of them is that victims are subjected to additional suffering at the hands of the criminal justice system. While it may be appropriate for police officers to use dual arrest in a limited number of incidents, its extensive use in Connecticut demands explanation. This research has attempted to add to the understanding of the dual arrest decision by conducting focus groups of patrol officers, those law enforcement officials tasked to make the actual decisions. What emerged from the discussions was the need for a comprehensive approach to intimate partner violence investigations.

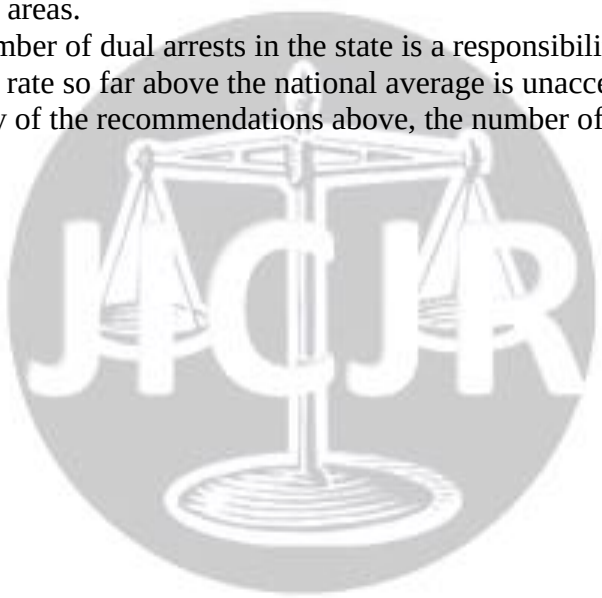
Although most officers agreed that these types of investigations merit police involvement, they must be prioritized as serious criminal investigations. They are complex in nature and require that investigating officers understand the context of the violence. To accomplish this, policies must provide guidelines for a careful and complete investigation and police departments/police supervisors must allow officers the time to conduct them (just as they do for other serious crimes). The training regimen must include modules on the dynamics of the

abusive relationship and why intimate partners may respond as they do. Field training officers must be well informed in this area and communicate to their charges the importance of conducting a thorough investigation. As identified by the focus group members, patrol supervisors can be important figures in the decision to arrest. They must allow officers to conduct their own investigations, intervening only to correct errors in judgment. Continual review of reports is essential. Discussing dual arrests with officers has the ability to highlight problems areas. This will improve the on scene response and better protect victims of this crime.

As to statutory language, the state of Connecticut should include a primary aggressor provision. If implemented properly, it has the potential to reduce dual arrests. It signals to patrol officers the need to separate offensive and defensive uses of force.

Specialized domestic violence units and docket courts send a message that the crime has been prioritized and is being taken seriously. The burden of some of these investigations could be shifted to those units, who would have the time and expertise to conduct them. Docket courts again signal that this type of crime is serious. They allow for more continuity in prosecution, resulting in victim protection and satisfaction and offender accountability. More research needs to be in these two policy areas.

Reducing the number of dual arrests in the state is a responsibility of the entire criminal justice system. Having a rate so far above the national average is unacceptable. With a concerted effort that includes many of the recommendations above, the number of victims arrested can be reduced.



Appendix A

List of Questions for the four focus groups:

1. When you have an arrest decision in a DV incident involving intimate partners, what factors influence that decision to arrest only one versus both individuals?
2. How familiar are you with your department's policy on family violence?
3. How is this policy usually communicated to officers in your department?
4. Do you think that the policy has had an effect on your decisions to use dual arrests (for example, the frequency of dual arrests that you've made)?
5. If you're from a department that is affiliated with a domestic violence docket court, do you think that affiliation has affected your decision to use dual arrest?
6. To what extent does the seriousness of the crime, as compared to other factors, influence your decision to use dual arrests in incidents involving intimate partner violence?
7. To what extent does the relationship of the two parties (spousal or nonspousal), as compared to other factors, influence your decision to use dual arrest in incidents involving intimate partner violence?
8. Is the Family Violence Offense Report clear or would you suggest any improvements in the form?
9. I would recommend a couple of changes to the form based on the results of my research. I'd like to get your thoughts on them.
10. I've been researching the use of dual arrests in departments across Connecticut. As a whole the data shows something interesting… I'd like to get your sense of why this pattern has occurred.

REFERENCES

Berk, S. F., Campbell, A., Klap, R., & Western, B. (1992). Bayesian analysis of the Colorado Springs spouse abuse experiment. *Journal of Criminal Law and Criminology, 83,* 170-200.

Bledsoe, L. K., Sar, B. K., & Barbee, A. P. (2006). Impact of coordinated response to intimate partner violence on offender accountability. *Journal of Aggression, Maltreatment & Trauma, 13,* 109-129.

Bruno v. Codd, 47 N.Y.2d 582 (1979).

Buzawa, E. S. & Buzawa, C. G. (2002). Understanding the context of dual arrest with directions for future research. Violence Against Women, 8, 1449-1473.

Buzawa, E. S. & Buzawa, C. G. (2003). Domestic violence: The criminal justice response (3rd ed.). Thousand Oaks, CA: Sage Publications.

Cares, A. (2007). *Family violence arrests, 2003-2004 annual report.* Connecticut Statistical Analysis Center.

Dunford, F. W., Huizinga, D., & Elliott, D. S. (1990). The role of arrest in domestic assault: The Omaha Police Experiment. *Criminology, 28,* 183-206.

Farrell, G. & Buckley, A. (1999). Evaluation of a UK police domestic violent unit using repeat victimization as a performance indicator. *The Howard Journal, 38,* 42-53.

Finn, M. A., Blackwell, B. S., Stalans, L.J., Studdard, S., & Dugan, L. (2004). Dual arrest decisions in domestic violence cases: The influence of departmental policies. *Crime & Delinquency, 50,* 565-589.

Finn, M. A. & Bettis, P. (2006). Punitive action or gentle persuasion: exploring police officers' justifications for using dual arrest in domestic violence cases. *Violence Against Women, 12,* 268-287.

Frye, V., Haviland, M, & Rajah, V. (2007). Dual arrest and other unintended consequences of mandatory arrest in New York City: A brief report. *Journal of Family Violence, 22,* 397-405.

Gover, A. R., Brank, E. M., & MacDonald, J. M. (2007). A specialized domestic violence court in South Carolina: An example of procedural justice for victims and defendants. *Violence Against Women, 13,* 603-626.

Gover, A. R., Paul, D. P., & Dodge, M. (2011). Law enforcement officers' attitudes about domestic violence. *Violence Against Women, 15*(5), 619-636.

Hirschel, J. D., Hutchison, I. W., Dean, C. W., Kelley, J. J., & Pesackis, C. E. (1991). *Charlotte Spouse Assault Replication Project: Final Report.* Washington, DC: US Department of Justice.

Hirschel, D. & Buzawa, E. (2002). Understanding the context of dual arrest with directions for future research. *Violence Against Women, 8,* 1449-1473.

Hirschel, D., Buzawa, E., Pattavina, A., Faggiani, D. & Reuland, M. (2007). *Explaining the prevalence, context, and consequences of dual arrest in intimate partner cases.* Washington, D.C.: United States Department of Justice.

Klinger, D. (1994). Demeanor or crime: Why "hostile" citizens are more likely to be arrested. *Criminology, 32,* 475-493.

Martin, M. E. (1997). Double your trouble: Dual arrest in family violence. *Journal of Family Violence, 12,* 139-15.

Miller, S. L. (2001). The paradox of women arrested for domestic violence: Criminal justice

professionals and service providers respond. *Violence Against Women, 7,* 1339-1376.
Monell v. New York City Department of Social Services, 436 U.S. 658 (1978).
Office of the Chief State's Attorney, Police Officer Standards and Training Council, & Connecticut Coalition Against Domestic Violence (2012). *Police response to crimes of family violence: Model policies, procedures, and guidelines*.
Osthoff, S. (2002). But, Gertrude, I beg to differ, a hit is not a hit is not a hit. *Violence Against Women, 8*, 1521-1544.
Pate, A. & Hamilton, E. (1992). Formal and informal deterrents to domestic violence: The Dade County Spouse Assault Experiment. *American Sociological Review, 57*, 691-697.
Peng, Y. & Mitchell, D. C. (2001). *Dual arrest among intimate partners for family violence offenses in Connecticut.* Middletown, CT; Connecticut State Police, Crime Analysis Unit.
Scott v. Hart, No. C-76-2395 (N.D. Cal. 1976).
Sherman, L. W. (1992). *Policing domestic violence.* The Free Press: New York.
Sherman, L. W. & Berk, R. A. (1984a). *The Minneapolis Domestic Violence Experiment.* Washington, DC: Police Foundation.
Sherman, L. W. & Berk, R. A. (1984b). The specific deterrent effects of arrest for domestic assault. *American Sociological Review, 49,* 261-272.
Sherman, L. W., Schmidt, J. D., Rogan, D. P., Smith, D. A., Gartin, P. R., Cohn, E. G., Collins, D. J., & Bacich, A. R. (1992a). The variable effects of arrest on criminal careers: The Milwaukee Domestic Violence Experiment. *Journal of Criminal Law and Criminology, 83*, 137-169.
Sorichetti v. City of New York, 482 N.E. 2d 70 (N.Y. 1985). Stalans, L. J. (1995). How novice and experienced officers interpret wife assaults: Normative and efficiency frames. *Law & Society Review, 29*, 287-321.
State of Connecticut Department of Emergency Services and Public Protection (2001). *Family violence arrests: Annual report 2000.*
State of Connecticut Department of Emergency Services and Public Protection (2002). *Family violence arrests: Annual report 2001.*
State of Connecticut Department of Emergency Services and Public Protection (2003). *Family violence arrests: Annual report 2002.*
State of Connecticut Department of Emergency Services and Public Protection (2004). *Family violence arrests: Annual report 2003.*
State of Connecticut Department of Emergency Services and Public Protection (2005). *Family violence arrests: Annual report 2004.*
State of Connecticut Department of Emergency Services and Public Protection (2006). *Family violence arrests: Annual report 2005.*
State of Connecticut Department of Emergency Services and Public Protection (2007). *Family violence arrests: Annual report 2006.*
State of Connecticut Department of Emergency Services and Public Protection (2008). *Family violence arrests: Annual report 2007.*
State of Connecticut Department of Emergency Services and Public Protection (2009). *Family violence arrests: Annual report 2008.*
State of Connecticut Department of Emergency Services and Public Protection (2010). *Family violence arrests: Annual report 2009.*

State of Connecticut Department of Emergency Services and Public Protection (2011). *Family violence arrests: Annual report 2010.*
State of Connecticut Department of Emergency Services and Public Protection (2012). *Family violence arrests: Annual report 2011.*
State of Connecticut Department of Emergency Services and Public Protection (2013). *Family violence arrests: Annual report 2012.*
Thurman v. City of Torrington, 595 F. Supp. 1521 (1984).
United States Attorney General's Task Force on Family Violence (1984). Washington, DC: United States Government Printing Office.
Waaland, P. & Keeley, S. (1985). Police decision making in wife abuse: The impact of legal and extralegal factors. *Law and Human Behavior, 9,* 355-366.
White, M. D. (2001). Controlling police decisions to use deadly force: Reexamining the importance of administrative policy. *Crime & Delinquency, 47,* 131-1.
Worden, R. E. (1989). Situational and attitudinal explanations of police behavior: A theoretical reappraisal and empirical assessment. *Law & Society Review, 23,* 667-711.