

EXPERT INSIGHTS

Four-Footed and Largely Forgotten: Exploring the Connections Between Animal Abuse and Domestic Violence

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"I am sometimes asked, 'Why do you spend so much of your time and money in talking about kindness to animals, when there is so much cruelty to men?' And I answer, 'I am working at the roots.' Every humane publication, every lecture, every step in doing or teaching kindness . . . is a step to prevent crime—a step in promoting growth of those qualities of the heart which will elevate human souls . . ."

— George Angell, Founder of the Massachusetts Society for the Prevention of Cruelty to Animals

In 2005, Americans spent 36.3 billion dollars on their pets. [1] Aside from necessities like food and medical care, this figure included such luxuries as edible greeting cards, climate controlled carriers, and specialty clothing ranging from four hundred and fifty dollar leather dog jackets to twenty-two dollar Halloween costumes. [2] Of course not everyone can afford, nor would they necessarily desire, to dress their dog or cat as pirate Captain Jack Sparrow this October thirty-first. But with so much money being spent to care for and pamper America's pets, it is easy to agree with author Justin Grant's assessment that in the last few decades many pets have gone from being looked upon as beasts of burden to becoming full fledged members of human families who celebrate holidays, birthdays, and other special events with their human caregivers. [3]

This evolution of pets from what we might term property with a purpose (i.e. cats as mouse catchers and dogs as guardians of homes and businesses) to what we now like to call 'companion animals' has had both positive and negative consequences for all of the parties involved. [4] Animals of all shapes, sizes, and breeds have benefited from increased attention and care while human beings like lonely senior citizens or troubled youth have found a source of unconditional love and acceptance in their pets. [5] However, as companion animals have made their way into our hearts and homes, many have also become exposed to (and frequently victims of) domestic violence. Abusers often use companion animals to dominate and control their human victims, buying their victim's silence and compliance by threatening, torturing, or even

killing a beloved pet. [\[6\]](#)

This article will briefly explore the history and development of anti-cruelty statutes and the documented connections between animal abuse and human violence. The focus of the article, however, will be on animal abuse in the context of domestic violence. Finally, the article will offer suggestions for police, court personnel, domestic violence advocates, animal shelter staff, and other interested individuals on how to create and implement plans and programs that will protect and benefit both domestic violence victims and their pets.

History of Anti-Cruelty Statutes

While much of the research linking animal abuse and domestic violence is relatively new and was until recently largely ignored, animal abuse itself has been a concern of lawmakers and humanitarians for centuries. [\[7\]](#) Some of the earliest laws dictating the proper care and treatment of animals in what would become the United States were passed by the Massachusetts Bay Colony in 1641. [\[8\]](#) These were followed by a small flurry of legislation along the East Coast between 1800 and 1820 in which horses and livestock were protected from willful and malicious killing by individuals other than their actual owners. [\[9\]](#) Such laws, while protecting farm animals, were based solely on the legal theory of animals as personal property and not on animals as living beings with the capacity to experience suffering. [\[10\]](#) Essentially the laws were designed to compensate animal owners for the loss of their valuable property or their livelihood at the hands of another. It was not until 1829, when New York passed what we would recognize as the first real anti-cruelty statute, that owners of livestock became subject to legal sanctions for beating, torturing, or killing their own animals. [\[11\]](#) However, animal cruelty in New York in 1829 was classified as a misdemeanor with a relatively light punishment and the statute did not extend protection to companion animals such as cats or dogs since they were not deemed economically important enough to warrant such protection. [\[12\]](#)

Companion animals as we know them today were incorporated into anti-cruelty statutes largely due to the lobbying efforts of men like Henry Bergh, president and founder of the American Society for the Prevention of Cruelty to Animals (“A.S.P.C.A.”). Bergh, and other like-minded individuals, saw that the statutory language of New York’s animal cruelty law was changed in 1867 to offer protection to any living creature, whether suffering abuse or neglect at the hands of either owners or strangers. [\[13\]](#) Other states took their cue from New York and placed the same or similar laws on their books soon thereafter. [\[14\]](#) However, the majority of states, including New York, continued to punish animal abuse as a misdemeanor, imposing fines ranging from five dollars in Nebraska to one hundred dollars in Michigan with little or no accompanying jail time. [\[15\]](#)

Animal Abuse and Domestic Violence Today

Since 1990 however, a gradual transition has occurred with more states including enhancement penalties for particular kinds of animal abuse or for repeat offenders. [\[16\]](#) Wyoming’s statute §6-3-203(e) makes animal cruelty a misdemeanor with a fine of seven hundred and fifty dollar or a sentence of not more than six months of imprisonment or both [\[17\]](#)—unless the animals are dogs or birds used for fighting purposes, in which case the animal abuse is considered to be aggravated and the fine increased to five thousand dollars and the term of imprisonment to one year. [\[18\]](#)

At present most animal abuse prevention statutes have provisions similar to those of Wyoming in which the definition of animal cruelty encompasses both passive neglect and active abuse. Passive neglect can include things like failure to provide an animal with proper food and water, protection from the weather, or appropriate veterinary care. [\[19\]](#) Active abuse, the type most commonly suffered by animals caught up in the cycle of domestic violence, can include things like the needless torturing, beating, mutilating or killing of an animal without justification. [\[20\]](#)

One disturbing example among many of active abuse was recorded by Jane Ann Quinlisk during her first

day on the job as a counselor in a battered women's shelter. In explaining why she needed to return home immediately, Ms. Quinlisk's first client of the day pulled an envelope from her purse and presented the counselor with photographs of her abusive husband cutting the ears off of her favorite dog with a set of pinking shears. [21] Although the jurisdiction had an animal cruelty statute in place, the battered woman explained to Ms. Quinlisk that her hometown lacked an animal shelter and that the sheriff was her husband's cousin and would refuse to enforce the law anyway. The woman felt that the only way to protect her dog was to go home. She never returned to the women's shelter. [22]

Although the sheriff in Jane Ann Quinlisk's story was likely to neglect his duty to enforce his state's animal anti-cruelty law because of his relationship to the victim's batterer, he may still be viewed as the rule rather than the exception. A number of other law enforcement officers around the country (along with their prosecutorial counterparts) also sometimes fail to enforce their jurisdiction's animal abuse statutes; albeit for very different and arguably more legitimate reasons. Police and prosecutors often struggle with statutes that are poorly worded and set various levels of mental culpability that may be difficult to prove. [23] Also many may consider arresting and prosecuting misdemeanor animal abuse cases to be a waste of their department's valuable time and limited resources in a world where violent felonies are being perpetrated against human beings. [24] In places like New York or Arizona, enforcement issues are further complicated by the delegation of authority to humane organizations like the A.S.P.C.A. who may have investigative and arrest powers and may or may not work well in conjunction with local police departments. [25]

Even if a statute is clear, an arrest has been made, and a prosecutor has filed charges against an animal abuser, some judges continue to hand down minimal sentences that most scholars and animal rights advocates feel have very little deterrent value. [26] For example, Frank R. Ascione, a psychology professor at Utah State University who studies the connection between animal abuse and human interpersonal violence, recalled a 1991 case whose judicial outcome deeply disturbed him. Two teenage boys in Salt Lake were arrested for animal cruelty after they trapped a stray cat, used it for target practice by shooting arrows into it, and then stomped it to death. The boys were ultimately apprehended because they had made a video tape of the abuse and showed it to some of their friends. The judge in the case fined the boys one hundred dollars and let them return home. When Professor Ascione later questioned the judge about his failure to require counseling for the boys, the judge responded that because "it was only a cat, social services personnel were too busy to consider [the case]." [27]

Of course this attitude that animal abuse is not serious enough to warrant the expenditure of valuable court system resources is not limited to those that sit on the bench. Social workers, domestic violence advocates, child abuse advocates, and even ordinary citizens often feel that if the courts are to be utilized and the government's money best spent then the focus needs to be on punishing human perpetrators for harming human victims. [28] Those who advocate for animals, however, presently have at their fingertips some impressive studies emphasizing the connections between animal abuse and human violence, including domestic violence and child abuse. [29] If properly presented, these studies could work to persuade those of other disciplines of the significance of animal abuse, especially in households where other types of violence occur, and demonstrate why cooperation and cross-training between agencies that aid animals and agencies that help human violence victims would be beneficial for all.

Psychologists and others who study human behavior have long suspected a connection between animal abuse perpetrated by adolescents and later violent behavior occurring in adulthood that is directed at other human beings. [30] Some people may be familiar with the so-called "triad" developed by a psychiatrist named MacDonald in 1963. By studying one hundred patients in a mental hospital who had a history of threatening violence, MacDonald determined that the most sadistic patients generally shared three characteristics that first appeared in early childhood; enuresis, fire starting, and torturing small wild or domesticated animals. [31]

Although MacDonald later discounted the significance of the triad, his research was picked up in 1966 by

two other psychiatrists, Hellman and Blackman, who believed that the existence of the triad could help mental health professionals target children who might be at risk later in life for developing violent antisocial personalities. [32] Even though the triad continues to be a point of contention in some circles regarding its value as a predictability tool, the Federal Bureau of Investigation (“F.B.I.”) has discovered that at least one of the three factors, specifically animal cruelty, has predominately figured into the histories of many habitually violent criminals. [33] Most notably serial killers like Albert DeSalvo, Ted Bundy, and Carrol Edward Cole all admitted to torturing and killing small animals as children. [34] Cole’s first recorded act of violence was the strangulation of a cat while DeSalvo was known for trapping dogs and cats in small crates and then shooting them full of arrows. [35]

This is not to say, of course, that all children who abuse animals will grow up to be serial killers. However, the connection has, in the words of Kenneth White, been “frighteningly well documented.” [36] In the field of domestic violence, however, only a small handful of studies have recently been conducted to determine how animals are used by batterers to control their human victims and what the effects of witnessing animal abuse may be on children who come from homes where domestic violence occurs. [37] One of the most famous studies, administered by Frank R. Ascione in the early 1990s, involved interviews with thirty-eight battered women seeking admittance to a shelter in Utah. Seventy-four percent of the women were pet owners and three-quarters of them told their interviewer that their male abuser had either threatened to kill or had actually hurt or killed one or more of their pets. [38] One man threatened to place a woman’s cat in the blender while another actually poured lighter fluid on his wife’s kitten and set it on fire. [39] Eighteen percent of the women who participated in Ascione’s interviews admitted that fear for their pet had prevented them from utilizing the shelter’s services sooner since they did not want to leave their animals at the mercy of their abusers and, at the same time, they felt unable to come up with suitable alternative care. [40]

Ascione, in a 1998 article presenting his findings on animal abuse and domestic violence, admitted that “caution must be exercised in generalizing from this study’s small sample to state and national samples. . .” [41] However, he felt that the interviews given by the Utah women were important because they shed light on what he believed to be a hugely underreported and unacknowledged problem. As Ascione noted,

[if] 3 million is a conservative estimate of the number of U.S. women assaulted by their male partners each year [and] if half of these women have pets. . . [then the Utah study findings suggest that in] hundreds of thousands of families. . . pet victimization, actual or threatened, is part of the landscape of terror to which some women are exposed. [42]

In addition to reporting on their male abusers actions, thirty-two percent of the women surveyed by Ascione in Utah who had children also mentioned that their children engaged in acts of animal cruelty. [43] Among other things, these children had sodomized a cat, cut chunks of hair out of a dog’s coat, and broken a kitten’s neck. [44] Author Lynn Loar has speculated that several different motives likely underlie such abuse when it is perpetrated by children who live with domestic violence. First, children living in violent households may seek to pre-empt an abuser from torturing and killing a beloved pet by giving the pet what the child might feel to be a more merciful death. [45] On the other hand, the child might be seeking to either emulate the abusive and hence more powerful parent, or the child might be venting his frustration by abusing the only family member weaker than himself. [46] On occasion, a child might even be rehearsing suicide. [47] Regardless of the reason why children may hurt or kill a pet under these circumstances, most researchers and scholars agree that whether they have witnessed animal abuse or have actively abused an animal, these children are at an increased risk for developing mental health problems that may plague them for the rest of their lives. [48] They should be screened for and provided with appropriate counseling at the first available opportunity.

When victims of domestic violence decide to leave an abusive relationship, they are often faced with some very difficult decisions. For those who have pets, they must decide if they should leave their pets at home with their abuser or whether they should surrender the pets to an animal shelter or attempt to board them

with friends or neighbors. While some people may not understand why domestic violence victims often worry about the fate of their pets, those who are familiar with the dynamics of domestic violence know that abusers often isolate their victims. [49] In these cases a pet might be a woman's only companion with whom she has developed a deep and caring relationship. [50] Leaving the animal behind to suffer the wrath of the abuser can cause the victim to feel guilty and, as in the case of Jane Ann Quinlisk's client who left the safety of the women's shelter to return home to 'protect' her beloved dog, the abuser may use threats against the animal to lure his victim back to him. [51]

Dropping a pet off at an animal shelter is often not an appealing alternative either for victims fleeing abusive relationships. Animal shelters are often overcrowded and the pet may be euthanized or adopted out before the victim can reclaim it. [52] Finally some domestic violence victims may hesitate to ask friends or neighbors to care for a pet because doing so might put them at risk should the abuser come to reclaim the animal. Also, since many abusers keep their victims from knowing about or having access to the 'family' finances, [53] the victim may feel that since they cannot offer to help pay any of the costs associated with the animal's upkeep they cannot ask their friend or neighbor to look after their pet for what may amount to several weeks or even months. [54]

Suggestions For The Future

Authors like Jane Ann Quinlisk recommend that those who provide services, legal or otherwise, to victims of domestic violence ask questions about animals and animal abuse during the screening process and have women (who are typically the victims of domestic violence) [55] create a safety plan that involves their pet to some degree. [56] As Ms. Quinlisk notes, however "it is important [for service providers] to refrain from seeming judgmental if [the woman] indicates a need to leave the animal behind [since] it may be her only choice and it may be causing her guilt and anguish." [57]

Ms. Quinlisk suggests that screening questions include things like the number of animals in the home, specific concerns for their welfare, whether or not the abuser has harmed or killed an animal before, and whether the woman knows anyone who could take care of her pet should she decide to leave the relationship. [58] The Humane Society of the United States has created a brochure which lists things women may want to consider when fleeing an abusive relationship with their pets. Some of these ideas could easily be incorporated into a safety plan. These include things like putting together a small bag with the pet's license and/or medical records (to help establish ownership) as well as a favorite toy or blanket (to help calm the pet). [59] The Humane Society emphasizes that women should also keep a box or carrier on hand (although a pillow case would work in a pinch) to transport cats or other small animals that may otherwise become scared and run away at inopportune moments. [60]

Once a safety plan is executed and a woman escaping domestic violence arrives at a women's shelter with her pet, the question of what to do with the animal can present a serious and immediate problem. Most battered women's shelters will not accept pets for reasons ranging from allergies, to lack of space, to the fact that as a public building the shelter might be legally prohibited from housing animals. [61] Some women's shelters have solved this problem, however, by partnering with local animal shelters to provide both human victims and their pets with safe and secure lodging. These innovative programs, sometimes referred to as Safe Harbor Programs For Pets, are still relatively new and some have a few kinks that need to be worked out. [62]

In his landmark study, sponsored by the Geraldine R. Dodge Foundation, Professor Frank R. Ascione surveyed by phone 21 domestic violence shelters and 20 animal welfare agencies to determine the parameters of their programs for domestic violence victims and their pets. [63] He discovered that some of the major areas of concern included how the program could be safely advertised and how funding could be generated. [64] There were also some animal shelters that expressed uncertainty over the legality of accepting animals into the program if the women seeking to use the service could not sufficiently

demonstrate ownership. [65]

Advertising the availability of a Safe Harbor Program can create tension between two of the key goals of domestic violence advocates and animal shelter staff. First, both desire to let women know about the availability of the service in order to enable them to leave abusive relationships without having to worry about the fate of their pets. [66] At the same time, however, both want to keep knowledge of the program from batterers who might show up at a participating animal shelter looking to reclaim the pet and who might threaten or injure shelter staff who refuse to acquiesce to his demands. [67]

Some programs solved this problem by not advertising at all while others only advertised in domestic violence clinics. [68] A few put posters and brochures out in certain strategic locations like veterinarian's offices and schools and made community presentations from time to time. [69] While not advertising seems likely to lead to an under-utilization of the service, strategic advertising and making the program known to staff at battered women's shelters and other participants in programs that help victims of domestic violence would appear to yield the necessary balance between the need to inform victims of the program's availability and the need to keep it secret from the community's abusers.

Funding presented a similar problem for shelters seeking to keep their programs up and running. Since many animal shelters engage in public fundraising, the fear of making batterers aware of the program's existence again had to be weighed against the need to generate funds to feed and care for the animals of domestic violence victims whose stay at the shelter could range anywhere from a few weeks to several months. [70] Animal shelters in rural areas felt especially disadvantage since many of them operated on a shoe-string budget to begin with. [71] One of the best solutions to this difficult problem involved seeking out private donors who had a history of helping the shelter and explaining to them the importance of the program and the need for secrecy. [72] Donors could then either give cash gifts to the shelter or provide necessities like bags of pet food or cat litter.

For animal shelters with concerns about the legality of accepting an animal if the battered woman could not provide proof of ownership, their problems were often exacerbated by the fact that most shelter staff were unaware of their state's property laws and were uncertain of how pet ownership could be established. [73] Ascione advised animal shelters in Utah to get legal counsel whenever possible since ignoring property rights could create liability issues for the shelter. [74] If a shelter cannot afford to hire an attorney, they might want to consider independently approaching attorneys in their community to see if they might be willing to donate some of their time to help the shelter staff understand the ins and outs of the legal system. As a general rule, pet ownership can often be established by presenting veterinarian bills with the woman's name on them. [75] To this end local veterinarians may also be persuaded to offer discounted general health exams for pets of battered women so that the women can have at least one document naming them as the legal owner of the pet. Shelters can then take custody of the pet, at least on paper, and generate secure records in which the animal can be renamed and marked as adopted in order to thwart batterers from finding and attempting to reclaim the pet. [76]

Given some of the well documented connections between animal and human violence, the creation of programs like Safe Harbor may be seen by some as long overdue. By working together and involving members of the community (like attorneys, veterinarians, and private donors) animal welfare agencies and domestic violence advocates can make it easier for a victim to escape a violent relationship without having to leave their pet at home with their abuser or having to make the difficult decision to abandon the animal at a shelter and hope for the best. When animal welfare is considered in conjunction with human welfare, everyone (whether they have two legs or four) reaps the benefits.

This essay was the third place winner of the 2007 ABA Commission on Domestic Violence Law Student Writing Competition (www.abanet.org/domviol/students.html). Diana Wempen is a third year law student at the University of Wyoming College of Law and will graduate with her J.D. in May of 2008.

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Notes

1. American Pet Products Manufacturers Association (www.appma.org/press_industrytrends.asp), (last visited September 20, 2007).
2. Justin Grant, *Pampered Pets Dress Up for Halloween* (www.msnbc.msn.com/id/15287517/), Reuters, Oct. 16, 2006, (last visited September 20, 2007).
3. *Id.*
4. Phil Arkow, *The Evolution of Animal Welfare as a Human Concern*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking The Circles of Compassion for Prevention and Intervention* 19, 20 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).
5. *Pets and Seniors* (www.doctordog.com/DrdogNewsletter/petseniors.html), (last visited September 20, 2007).
6. Arkow, *supra* note 4, at 21.
7. Frank R. Ascione, *The Abuse of Animals and Interpersonal Violence: Making the Connection*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 50, 51-52 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).
8. Arkow, *supra* note 4, at 22.
9. David Fare and Vivien Tsang, *The Development of Anti-Cruelty Law During the 1800s*, in *Cruelty to Animals and Interpersonal Violence: Readings in Research and Application* 32, 38 (Randall Lockwood and Frank R. Ascione eds., Purdue University Press 1998).
10. *Id.*
11. *Id.* at 40.
12. *Id.*
13. *Id.* at 46-47.
14. *Id.* at 52.
15. *Id.* at 53.
16. The Humane Society of the United States (http://www.hsus.org/legislation_laws/citizen_lobbyist_center/animal_cruelty_laws_where_does_your_state_stand.html), (last visited September 20, 2007).
17. Cruelty to animals; penalties; limitation on manner of destruction, Wyo. Stat. Ann. § 6-3-203 (2000).
18. *Id.*
19. *Id.*
20. Charlotte A. Lacroix, *Another Weapon for Combating Family Violence: Prevention of Animal Abuse*, in

Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention 62, 68 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).

21. Jane Ann Quinlisk, *Animal Abuse and Family Violence, in Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 168, 168 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).

22. *Id.*

23. Lacroix, *supra* note 20, at 69.

24. *Id.*

25. *Id.*

26. Ascione, *supra* note 7, at 52.

27. *Id.*

28. Arkow, *supra* note 4, at 27-28.

29. *Id.* at 26-27.

30. Linda Merz-Perez and Kathleen M. Heide, *Animal Cruelty: Pathway to Violence Against People* at 6 (Altamira Press 2004).

31. *Id.*

32. *Id.* at 6-7.

33. Randall Lockwood and Ann Church, *Deadly Serious: An FBI Prospective on Animal Cruelty, in Cruelty to Animals and Interpersonal Violence: Readings in Research and Application* 241, 242 (Randall Lockwood and Frank R. Ascione eds., Purdue University Press 1998).

34. Lynn Loar and Kenneth White, *Connections Drawn Between Child and Animal Victims of Violence, in Cruelty to Animals and Interpersonal Violence: Readings in Research and Application* 314, 316 (Randall Lockwood and Frank R. Ascione eds., Purdue University Press 1998).

35. *Id.*

36. *Id.*

37. Frank R. Ascione, *Children Who are Cruel to Animals: A Review of Research and Implications for Developmental Psychopathology, in Cruelty to Animals and Interpersonal Violence: Readings in Research and Application* 83, 92-93 (Randall Lockwood and Frank R. Ascione eds., Purdue University Press 1998).

38. Frank R. Ascione, *Battered Women's Reports of Their Partners' and Their Children's Cruelty to Animals, in Cruelty to Animals and Interpersonal Violence: Readings in Research and Application* 290, 296 (Randall Lockwood and Frank R. Ascione eds., Purdue University Press 1998).

39. *Id.*

40. *Id.*

41. *Id.* at 297.

42. *Id.*

43. *Id.* at 296.

44. *Id.*

45. Lynn Loar, "I'll Only Help You If You Have Two Legs" or Why Human Service Professionals Should Pay Attention to Cases Involving Cruelty to Animals , in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 120, 126 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).

46. *Id.*

47. *Id.* at 127.

48. Ascione, *supra* note 38 at 293.

49. Domestic Abuse Intervention Project, Duluth, MN, *Power and Control Wheel, in Domestic Violence Law* 38, 38 (Nancy K. Lemon ed., Thomson-West 2d ed. 2005).

50. Quinlisk, *supra* note 21, at 168-169.

51. *Id.* at 168.

52. Human Society of the United States, *supra* note 16.

53. Domestic Abuse Intervention Project, Duluth, MN, *supra* note 50 at 38.

54. Tamara Barnes, *Out of the Ashes . . . A Program of Hope, in Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 190, 190-192 (Frank R. Ascione and Phil Arkow eds., Purdue University Press 1999).

55. Patricia Tjaden and Nancy Thoennes, *Extent, Nature, and Consequences of Intimate Partner Violence: Findings From the National Violence Against Women Survey, in Domestic Violence Law* 92, 93 (Nancy K. Lemon ed., Thomson-West 2d ed. 2005).

56. Quinlisk, *supra* note 21 at 174.

57. *Id.*

58. *Id.*

59. The Humane Society of The United States, Brochure, *Making The Connection: Protecting Your Pet From Domestic Violence* (2004).

60. *Id.*

61. Frank R. Ascione, *Safe Haven for Pets: Guidelines for Programs Sheltering Pets for Women Who Are Battered* at 8 (Geraldine R. Dodge Foundation 2000).

62. *Id.* at 1.

63. *Id.* at 2.

64. *Id.* at 17-18, 62-63.

65. *Id.* at 37-38.

66. *Id.* at 17-18.

67. *Id.*

68. *Id.*

69. *Id.* at 18.

70. *Id.* at 62-64.

71. *Id.* at 7.

72. Quinlisk, *supra* note 21, at 172.

73. Aczione, *supra* note 62, at 39.

74. *Id.* at 40.

75. *Id.* at 37-38.

76. *Id.*