

EXPERT INSIGHTS

Expanding Domestic Violence Protective Orders to Include Companion Animals

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When Susan Walsh, a 50-year-old woman from a rural area in Maine, testified before the Maine State Legislature in March, 2006, she had no expectation of how powerfully and rapidly her words would resonate and become a catalyst for domestic violence prevention and animal welfare advocates nationwide. “It wasn’t just the cats and dogs,” she said. “It was the sheep and the chickens. I was terrified for their welfare. I knew if I were to leave, he wouldn’t hesitate to kill them. He had done it before.” [\[1\]](#)

Walsh’s testimony was part of a growing awareness of what is today called “The Link® (www.americanhumane.org/site/PageServer?pagename=lk_home)” between animal abuse and other forms of family violence. While conventional wisdom and historical tradition for centuries have focused on the implications of how animal cruelty adversely affects children, in recent years this concept has been expanded to include domestic violence as well.

Domestic violence is not as simple as one partner physically harming another. It consists of a complex range of controlling behaviors including physical, emotional, sexual and economic maltreatment, isolation, male privilege, blaming, intimidation, and threats. A growing body of research indicates that a significant number of individuals who abuse their partners also abuse their pets as part of this repertoire of controlling behaviors. Men who abuse the family pet have been reported to use more forms of domestic violence (sexual violence, marital rape, emotional violence, and stalking) and more controlling behaviors, and to be more dangerous, than non-pet-abusing batterers. [\[2\]](#)

In these battles of power and control, batterers take advantage of any opportunity to intimidate and coerce their victims, often using pets with whom the victim has a close emotional attachment. As many as 71% of victims in women’s shelters report that their abuser harmed, killed or threatened family pets. [\[3\]](#) Twelve independent surveys have reported that between 18% and 48% of battered women have delayed their decision to leave, or have returned to their batterer, out of fear for the welfare of their pets or livestock. [\[4\]](#)

As a result of growing scientific documentation of the frequent co-occurrence of animal abuse and intimate partner violence, state legislatures have begun to offer legal protection for the animal victims of family violence. Maine enacted the nation’s first laws in March, 2006 that empower courts to include companion

animals in domestic violence protective orders; within two months, Vermont and New York followed suit. In the 2007 legislative session, similar acts were quickly passed in California, Colorado, Connecticut, Illinois, Nevada, and Tennessee. As of this writing, similar bills are pending in Massachusetts, Michigan, New Jersey, Pennsylvania, and Wisconsin. [5] Bills in Maryland, Texas, Utah and Virginia died in committees but may be re-introduced in future legislative sessions. And while not specifically addressing protection orders, Indiana enacted P.L. 171-2007, which adds a new category of “Domestic Violence Animal Cruelty” to the state’s anti-cruelty statutes. [6]

Although the U.S. has the world’s oldest animal cruelty statutes, dating back to the Colonial era, animals are still considered personal property. While the concept of pets as mere chattel property is no longer acceptable to a growing body of animal activists, but the legal system is not yet ready to accord animals full legal rights, an acceptable compromise is working its way through legislation and case law reflecting the concept that animal abuse adversely affects human and societal well-being. [7] A majority of citizens advocate enactment of laws which increase animal protection. [8] Growing recognition of the sheer number and emotional significance of pets in the lives of family violence victims has resulted in: 43 states recodifying various forms of animal abuse as felonies; several states mandating cross-reporting of child abuse, animal abuse and domestic violence; and the inclusion of pets in protective orders granted in cases of intimate partner violence. The rapid enactment of pets in protection orders laws suggests that this strategy has exceedingly widespread public support.

Pets are ubiquitous in American culture: current estimates put the dog and cat population at 73.9 million and 90.5 million, respectively, helping to make the pet industry a \$38.4 billion economic sector in 2006. There are more dogs in the U.S. than there are people in most European nations – and more cats than dogs. It has been said that a child growing up in the U.S. is more likely to have a pet than a father. [9] More than 63% of U.S. households, or 69.1 million homes, care for one or more pets. [10] Our relationships with these animals have changed dramatically: only 2% of pet owners consider their animals to be “property”, while 51% consider them “companions” and 47% consider them to be “members of the family”. [11]

Much as with domestic violence batterers, perpetrators of cruelty to animals overwhelmingly are male. Studies in Massachusetts and Rhode Island reported 96% and 94% of defendants in animal cruelty cases, respectively, were male. [12] Animal cruelty investigators and domestic violence law enforcement officers are frequently dealing with the same perpetrators.

The Correlations Between Animal Abuse and Intimate Partner Violence

1. Animal abuse is consistent with, and often co-occurs with, the power and control mechanisms prevalent in intimate partner violence.

In one case in Ohio, a woman returned home where her husband told her, “Your dinner is in the oven.” When she went into the kitchen she found he had baked her cat at 500 degrees.

Household pets become pawns in the game of power and control that batterers use to coerce, control and intimidate their victims. Abusers often take advantage of women’s and children’s attachments to pets by threatening to harm or kill the family pet to ensure the woman will not leave or that the child will not report the abuse. It has been reported that 13% of intentional animal abuse cases involve domestic violence. [13] One study reported that 87% of batterer-perpetrated incidents of pet abuse were committed in the presence of their partners for the purpose of revenge or control. [14]

2. If he’s hurting animals, the women and children could be next.

One study of battered women in Texas reported that in 323 cases where pet abuse was present, 97% of the women reported emotional violence also occurred, 91% reported physical violence, 41% reported marital rape, 35% reported sexual violence, and 23% reported stalking behaviors. [15]

In a study of battered women in several Northeastern states, 48% of respondents reported that animal

abuse had occurred “often” during the past 12 months and another 30% reported the abuse occurred “almost always.” Animal abuse reported included punching, hitting, choking, drowning, shooting, stabbing, and throwing the animal against a wall or down the stairs. Respondents reported that animal abuse incidents coincided with violent outbursts against human family members 51% of the time. [\[16\]](#)

Addressing whether pet abuse has occurred can help women in violent relationships – and the attorneys and domestic violence workers assisting them – to understand that all of their partner’s behaviors, not simply the physical violence acted out toward them, work together to form a pattern of abuse. [\[17\]](#)

3. Fear for the welfare of household animals is a significant barrier that prevents thousands of battered women from escaping abusive situations.

In one case in Philadelphia, a batterer told his wife that if she left he would slit her dog’s throat in front of her. While contemplating suicide, she saw her dog and was seized by the thought that if she killed herself there would be no one to take care of her dog. Instead, she went into her husband’s bedroom and shot him. She was sentenced to a 10-to-30 year term for manslaughter.

Women’s attachments to pets can be intense. One woman lived in her car with her dogs for four months until space became available at Crosstrails, a pet-friendly women’s shelter in Larimer County, CO. [\[18\]](#) Australian researchers have reported that 35% of women delayed leaving abusive relationships for as long as eight weeks out of concern for their animals’ welfare. [\[19\]](#)

When victims seeking shelter leave pets behind, abusers often retaliate by torturing or killing the pets. This is of particular concern in rural communities. [\[20\]](#) Including animals in protective orders is a significant way to remove an obstacle that prevents victims from seeking safety from violent homes.

4. Female pet owners often have strong emotional ties to their animals that make them particularly vulnerable.

A teenaged girl in St. Paul, MN spurned the advances of an admirer. On Valentine’s Day 2007, she found a gift-wrapped box on her doorstep containing the severed head of her dog who had been decapitated with a chainsaw. The admirer was charged with two felony counts of animal cruelty.

Researchers have found that women express considerable empathy, affection and concern for animals, which can be used as a weapon by batterers seeking emotional control. In 12 studies assessing animal abuse as a risk factor for intimate personal violence, the proportion of women who currently or recently had pets in their homes ranged from 40.2% to 90.6%. [\[21\]](#) Pets are found in nearly two-thirds of homes with children under age 6, and in three-quarters of homes with children over age 6: the female head of the household is the primary caregiver of these pets in nearly three-quarters of these homes. [\[22\]](#) It is clear that the widespread presence of pets in women’s lives makes the animals potential targets of abuse and adds another layer of vulnerability to battered women.

5. In addition to harm to animals and battered women, cruelty to animals often has significant deleterious effects on children’s development.

Children who are exposed to domestic violence are nearly three times more likely to have been cruel to animals than children not exposed to such violence. [\[23\]](#) In one study of battered women with children who sought shelter in a safehouse, 32% reported their children had hurt or killed a family pet. [\[24\]](#) Many studies have reported alarming connections between childhood histories of perpetrating or witnessing animal cruelty and subsequent interpersonal violence in adolescence and adulthood. [\[25\]](#)

Animals have unique and important roles in child development, as direct contact with and emotional attachment to animals can help children develop empathy with other living creatures. [\[26\]](#) Children often intervene to protect their mothers and pets from being battered. Some children may even allow themselves to be victimized to save their pet from being harmed or killed. [\[27\]](#) Alternatively, children who are victims themselves may transfer that victimization to animals: 36.8% of boys and 29.4% of girls who were victims

of physical and sexual abuse and domestic violence have been reported to abuse family pets. [\[28\]](#)

Why Include Animals in Protective Orders?

Killing, harming, threatening, or removing a pet is a form of emotional abuse for the victim and removes a source of comfort and unconditional love for women and children who are already living in a landscape of terror. The California Legislature passed SB 353 allowing pets to be included in protection orders based on the premise that “perpetrators often abuse animals in order to intimidate, harass, or silence their human victims.”

It is clear that animals frequently are killed, harmed, or threatened in abusive households. Including them in protection orders is an important way to ensure their welfare, protect all victims, and break the cycles of family violence.

The Emergence of Safe Haven Shelters

Most of the research to date has focused on the prevalence of pet abuse in domestic violence households, and on discussing the need for domestic violence programs to accommodate pets. Many victims choose to remain in violent households unless pet-friendly housing, foster care, or re-homing options are available for their animals. One domestic abuse victim entered a shelter that did not accept pets, so she left her dog behind. Within days, her partner delivered an audiotape recording of him torturing the dog. Immediately thereafter, the woman left the shelter and never returned. [\[29\]](#)

Other victims retaliate: Ascione cites the case of Peggy Sue Brown, who fatally shot her husband after a seven-year ordeal of domestic violence and child abuse terror that included his skinning a pet rabbit alive in front of her and their baby. Mr. Brown held the infant next to the screaming rabbit and said, “See how easy it would be?” [\[30\]](#)

In response to the growing need for pet accommodation, over 160 “Safe Haven” programs [\[31\]](#) have been initiated across the U.S. whereby animal shelters, veterinarians, breed rescue groups and similar organizations collaborate with domestic violence prevention agencies to provide short- and long-term foster care for the animal victims of intimate partner violence. Several women’s shelters are building limited kennel facilities to house these animal victims directly. [\[32\]](#) Pet protective orders greatly assist battered women and their children, particularly in those communities where domestic violence shelters are neither equipped to house animals nor have such life-saving Safe Haven collaborations. [\[33\]](#)

What You Can Do

Private attorneys, victim services advocates, public defenders and prosecutors representing domestic violence victims in civil and criminal proceedings should routinely ask their clients if there have been instances of animal abuse or maltreatment. This information can help establish patterns of physical or emotional abuse in the household that may be relevant evidentiary information to be presented in court hearings. Attorneys should be prepared to strongly counsel their clients that if the batterer is harming animals, it is highly likely that she will be the next victim. Attorneys should assist their clients to include animals in their safety planning.

Attorneys can help direct women seeking shelter to “safe haven” safehouses that have established foster care programs for animals, and to pet-friendly apartment complexes and residential units. Local humane societies, women’s shelters and domestic violence coalitions may have resource lists of pet-friendly housing options available.

While it may be difficult to file charges against a batterer for numerous other instances of controlling behaviors and emotional abuse, it may be possible to file charges for acts of cruelty to animals under existing state statutes.

Custody and ownership issues

A frequent concern involves the true ownership or custody of a family pet, and may be problematic in joint custody states: when a pet has resided in the home of the victim and the abuser, how can it be determined who should legally have possession of the pet? Animals can be itemized in Pet Protection Orders, Divorce Orders, or other Court Orders that designate ownership and custody issues. Some initial Separation Orders prohibit the parties from moving any family members or assets (which could include pets) until final settlement.

Attorneys can help victims establish ownership of their animals to facilitate these processes. The victim's evidence of ownership and history of pet care may be established through pet adoption paperwork, dog and cat licenses, rabies vaccination certificates, microchip registration, pedigree registrations, and veterinary records listing the victim as the primary caretaker and/or individual who paid vet bills.

Professional training and development

As physicians and veterinarians have come to acknowledge that animal abuse is a serious human welfare issue [\[34\]](#) the legal profession is likewise recognizing that animal issues are of concern to human well-being. More than 60 law schools include animal law as part of the curriculum, and several schools publish animal law journals. As this trend continues, animal cruelty and Link issues should be taught to introduce these matters to future attorneys.

Likewise, the Link should be a topic of interest at statewide judicial and bar association training conferences. The American Humane Association has a speaker's bureau of prosecuting attorneys and others who can address these topics.

Public policy

Legislative and professional responses to the connections between animal abuse and family violence are accelerating. Prosecuting attorneys [\[35\]](#) and legislators [\[36\]](#) are considering animal abuse to be a more serious crime than was previously believed. The inclusion of pets in protection orders is the most recent step in this evolution and this trend is expected to continue.

Attorneys should actively support legislative efforts to include pets in preliminary, ex parte and permanent protective or restraining orders. In most states, this may be easily accomplished by adding minor amendments to existing state statutes. See the attached chart for current examples of statutory language.

Conclusion

*A spaniel, a woman
and a walnut tree:
the more they're beaten
the better they be.
— Old English proverb*

The presence of pet abuse in violent relationships should, at a minimum, be considered a red flag for victims, for the attorneys representing them, and for domestic violence workers addressing safety concerns. Identification of pet abuse is an important key to the assessment and treatment of both the victim and batterer, and may be significant in addressing the victim's legal options.

Legislation that includes animals in protective orders acknowledges the indisputable fact that pet abuse all too often keeps battered women locked in a life of terror. Pet protective orders are a straightforward and relatively simple step to protect all vulnerable members of the family.

To effectively protect both human and non-human victims from domestic abuse, American Humane (AHA) has been instrumental in promoting the need for domestic violence, animal protection, child protection, adult protective services, and law enforcement communities to coordinate resources. Attorneys, prosecutors, family court judges, victim services' advocates, and others in the legal profession can play significant roles in this effort. Enhancing awareness and knowledge about the relationship between violence to animals, children and women provides a unique opportunity for the legal profession and criminal justice system to enhance services to all vulnerable victims.

Additional Resources

American Humane Association, *PAWS Manual: Pets And Women's Shelters, A Guidebook For Establishing Animal Housing In Domestic Violence Safehouses* (2007).

American Humane Association, *Handling the Pets of Domestic Violence Victims* (1998).

Phil Arkow, *Breaking the Cycles of Violence: A Guide to Multi-Disciplinary Interventions, A Handbook for Child Protection, Domestic Violence and Animal Protection Agencies* (2003).

Frank R. Ascione, *Safe Havens for Pets: Guidelines for Programs Sheltering Pets for Women Who Are Battered* (www.vachss.com/guest_dispatches/ascione_safe_havens.pdf)(2000).

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

Lynn Loar & Libby Colman, *Teaching Empathy: Animal-Assisted Therapy Programs for Children and Families Exposed to Violence* (2004).

National Coalition Against Domestic Violence/American Humane Association: *Pets and Domestic Violence Fact Sheet* (www.ncadv.org/files/petsanddv.pdf).

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Notes

1. Pam Belluck, *New Maine Law Shields Animals in Domestic Violence Cases* (www.nytimes.com/2006/04/01/us/01pets.html?_r=1&oref=slogin), N.Y. Times, Apr. 1, 2006.

2. Catherine Simmons and Peter Lehmann, *Exploring the Link Between Pet Abuse and Controlling Behaviors in Violent Relationships*, 22(9) J. of Interpers. Viol. 1211-1222 (2007).

3. Frank R. Ascione, Claudia Weber, and David Wood, *The Abuse of Animals and Domestic Violence: A National Survey of Shelters for Women Who Are Battered*, 5(3) Soc. and Animals 205-218 (1997).
4. Frank R. Ascione, *Emerging Research on Animal Abuse as a Risk Factor for Intimate Partner Violence*, in *Intimate Partner Violence* 3-1 — 3-17 (K. Kendall-Tackett & S. Giacomoni, eds., Civic Research Institute 2007).
5. For a comprehensive summary of state protective order statutes addressing pets, prepared by the author, see "Statutory Summary Chart: Animals in Civil Protective Orders (<http://www.abanet.org/domviol/statutorysummarycharts.html>)."
6. IN ST 35-46-3-12.5 (2007) ("A person who knowingly or intentionally kills a vertebrate animal with the intent to threaten, intimidate, coerce, harass, or terrorize a family or household member commits domestic violence animal cruelty, a Class D felony.")
7. Margit Livingston, *Desecrating the Ark: Animal Abuse and the Law's Role in Prevention*, 87(1) U. of Iowa L. Rev. 7-72 (2001).
8. David Favre & Vivien Tsang, *The Development of Anti-Cruelty Laws During the 1800s*, Detr. C.L. Rev. 1 (1993).
9. Gail Melson, *Why the Wild Things Are: Animals in the Lives of Children* (2001).
10. American Pet Products Manufacturers Association (www.appma.org/press_industrytrends.asp), (last visited September 20, 2007).
11. American Veterinary Medical Association, *U.S. Pet Ownership & Demographics Sourcebook* (2002).
12. Arnold Arluke and Carter Luke, *Physical Cruelty Toward Animals in Massachusetts, 1975-1996*, 5(3) Soc. and Animals 195-204 (1997); Ronald C. Desnoyers, *Animal Cruelty in the State of Rhode Island: A Twenty-Five Year Perspective* (2005) (unpublished thesis submitted for the degree of Master of Science in Criminal Justice, Roger Williams University School of Justice Studies).
13. Humane Society of the U.S., *2000 Report of Animal Cruelty Cases* (2001).
14. J. Anne Quinlisk, *Animal Abuse and Family Violence*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention*, 168-175. (Frank R. Ascione and Phil Arkow, eds., Purdue University Press, 1999).
15. Simmons & Lehmann, *supra* note 2.
16. Pamela Carlisle-Frank & Tom Flanagan, *Silent Victims: Recognizing and Stopping Abuse of the Family Pet* (2006).
17. Simmons & Lehmann, *supra* note 2.
18. Lori Kogan, *Crosstrails: A Unique Foster Program to Provide Safety for Pets of Women in Safehouses*, 10(4) Viol. Against Women 418-434 (2004).
19. Eleonora Gullone, Judy Johnson, and Anne Volant, *The Link Between Animal Abuse and Family Violence: A Victoria-Wide Study*. Australian Veterinary Association Welfare Conference, Canberra (2004).
20. Catherine Faver, and Elizabeth Strand, *To Leave or To Stay? Battered Women's Concern for Vulnerable Pets*, 18 J. of Interpers. Viol. 1367-1377 (2003); Lisa Lembke, *Animal Abuse And Family Violence In A Rural Environment*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* (Frank R. Ascione and Phil Arkow, eds., Purdue University

Press, pp. 228-240 (1999).

21. Ascione, *supra* note 4

22. American Veterinary Medical Association, *supra* note 11.

23. C.L. Currie, *Animal Cruelty by Children Exposed to Domestic Violence*, 30(4) *Child Abuse & Neglect* 425-435 (2006).

24. Frank R. Ascione, *Battered Women's Reports of Their Partners' and Their Children's Cruelty to Animals*, 1 *J. of Emotional Abuse* 119-133 (1998).

25. See, e.g., Phil Arkow, *The Relationships Between Animal Abuse and Other Forms of Family Violence*, 12(1-2) *Family Violence & Sexual Assault Bulletin* 29-34 (1996); Fiona Becker and Lesley French, *Making The Links: Child Abuse, Animal Cruelty, and Domestic Violence*, 13(6) *Child Abuse Review* 399-414 (2004); Barbara W. Boat, *Abuse of Children and Abuse of Animals: Using the Links to Inform Child Assessment and Protection*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 83-100 (F. R. Ascione and Phil Arkow, eds.: 1999); Christopher Hensley and Suzanne E. Tallichet, *Learning To Be Cruel? Exploring the Onset and Frequency of Animal Cruelty*, 49(1) *Int'l. J. of Offender Therapy and Comp. Criminology* 37-47 (2005); Stephen R. Kellert and Alan R. Felthous, *Childhood Cruelty Toward Animals Among Criminals and Noncriminals*, 38 *Hum. Rel.* 1113-1129 (1985); Linda Merz-Perez, Kathleen M. Heide and Ira J. Silverman, *Childhood Cruelty to Animals and Subsequent Violence Against Humans*, 45(5) *Int'l J. of Offender Therapy and Comp. Criminology* 556-572 (2001); Stephanie Verlinden, Michel Hersen and Jay Thomas, *Risk Factors in School Shootings*, 20(1) *Clinical Psychol. Rev.* 3-56 (2000).

26. Frank Ascione, *Children and Animals: Exploring the Roots of Kindness and Cruelty* (2005); Hildegard George, *The Role of Animals in the Emotional and Moral Development of Children*, in *Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 380-392 (Frank Ascione and Phil Arkow eds., 1999).

27. Jeffrey L. Edleson, Lyungai F. Mbilinyi, Sandra K. Beeman and Annelies K. Hagemester, *How Children Are Involved in Adult Domestic Violence: Results of A Four-City Telephone Survey*, 18(1) *J. of Interpers. Viol.* 18-32 (2003).

28. Ascione, *supra* note 26

29. Clifton P. Flynn, *Animal Abuse in Childhood and Later Support for Interpersonal Violence in Families*, 7(2) *Soc. & Animals* 161-172 (1999).

30. Ascione, *supra* note 24.

31. A state-by-state directory of Safe Haven shelters is available at: www.hsus.org/hsus_field/first_strike_the_connection_between_animal_cruelty_and_human_violence/safe_havens_for_animals_/online_directory_of_safe_havens_for_animals_programs.html (last visited September 28, 2007).

32. American Humane, *Pets and Women's Shelters* (PAWS) Program (2007).

33. For guides to establishing and maintaining such programs, see Frank R. Ascione, *Safe Havens for Pets: Guidelines for Programs Sheltering Pets for Women Who Are Battered* (2000), available at: www.vachss.com/guest_dispatches/ascione_safe_havens.pdf. See also American Humane Association, *Operational Guide: Handling the Pets of Domestic Violence Victims* (2000), and American Humane Association, *PAWS Manual: Pets And Women's Shelters: A Guidebook for Establishing Animal Housing in Domestic Violence Safehouses* (2007).

34. Phil Arkow and Helen Munro, *The Veterinarian's Role in the Prevention of Family Violence: The Experience of the Human Medical Profession Regarding the Recognition and Reporting of Non-Accidental Injury in International Handbook on Cruelty to Animals* (Frank R. Ascione, ed. 2007); Phil Arkow, *The Veterinarian's Roles in Preventing Family Violence: The Experience of The Human Medical Profession*, 19(1) *Protecting Children 4-12* (2004); Phil Arkow, *Child Abuse, Animal Abuse, and The Veterinarian*, 204(7) *J. of the Am. Veterinary Med. Ass'n* 1004-1007 (1994); American Humane Association, *Recognizing and Reporting Animal Abuse: A Veterinarian's Guide* (Olson, P. ed., 1998); Gary J. Patronek, *Animal Cruelty, Abuse and Neglect, in Shelter Medicine for Veterinarians and Staff* 427-452 (L. Miller and S. Zawistowski, eds., 2004); Leslie Sinclair, Melinda Merck and Randall Lockwood, *Humane Society of the United States, Forensic Investigation of Animal Cruelty: A Guide for Veterinary and Law Enforcement Professionals* (2006).
35. Howard Davidson, *What Lawyers and Judges Should Know About the Link Between Child Abuse and Animal Cruelty*, 17(4) *Am. Bar Ass'n Child L. Prac.* 60-63 (1998); Livingston, *supra* note 6; Allie Phillips, *The Dynamics Between Animal Abuse, Domestic Violence and Child Abuse: How Pets Can Help Abused Children*, *The Prosecutor*, Sept.-Oct. 2004, 1-9; A. William Ritter, *The Cycle of Violence Often Begins with Violence toward Animals*, *The Prosecutor*, Jan.-Feb. 1996, 31-33; W. Andrew Sharp, *The Prosecutor's Role in Preventing Family Violence, in Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 273-287 (Frank R. Ascione and Phil Arkow, eds., 1999).
36. W. S. Cohen, *A Congressional View of the Cycle of Violence, in Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 335-337 (Frank R. Ascione and Phil Arkow, eds., 1999); Patrick Dougherty, *The Legislator's Perspective on Preventing Family Violence, in Child Abuse, Domestic Violence, and Animal Abuse: Linking the Circles of Compassion for Prevention and Intervention* 288-296 (Frank R. Ascione and Phil Arkow, eds., 1999).