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Susan L. Miller and Michelle L. Meloy
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Women's Use of Force

Voices of Women Arrested for Domestic Violence

Susan L. Miller

University of Delaware

Michelle L. Meloy

Rutgers University

Following changes in law enforcement policies that encourage or mandate arrest of domestic violence offenders, a concomitant increase in women arrested and mandated to batterer treatment programs has resulted. Most research findings, however, suggest that heterosexual intimate violence is gendered, with abuse, power, and control wielded by men over their female partners, and that when women use violence, it is typically in self-defense or for nonaggressive reasons. However, few studies have investigated the female batterer treatment programs and the context of the women's use of violence. Using qualitative data collected from observations of three female domestic violence offender programs, this article examines women's interpretations of their violent experiences. In addition, the findings raise policy-level questions about the appropriateness of such programs, weighing the costs and benefits of a criminal justice approach to women's use of force in intimate relationships.

Keywords: *treatment groups; violence; women*

As three special Violence Against Women (2002-2003) journal issues and numerous articles attest, scholars, advocates, and activists of domestic violence are struggling with the issue of battered women's use of violence in their intimate relationships. Increasingly, women are being arrested on domestic violence charges as part of dual arrests (when their partner is also arrested) or as a result of their own actions (Martin, 1997; S. L. Miller, 2001; Osthoff, 2002). Could these arrest increases mean that women are more willing to use violence against their abusive partners, or do the increases reflect a strict adherence by police and prosecutors to follow mandatory, preferred, or proarrest laws without examining the context of the incidents, or some-

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thing else? As the number of women arrested for domestic assault increases, with some facing child custody issues or refused service at battered women's shelters as a result of their offender classification and many mandated to batterer treatment programs, the stakes are getting higher. This article explores the perceptions and experiences of arrested women enrolled in three domestic violence treatment programs in one state.

Although many advocates privately acknowledge that women who are battered may hit back, most often in self-defense, the public discourse shies away from such admissions for fear of being misunderstood and taken out of context. This is not paranoia; a cadre of scholars, sometimes joined by antiwomen and backlash groups, cited that women who are battered engage in "mutual combat" with their abusive partners (cf. Farrell, 1999; Fiebert, 1997, 1998; Moffit & Caspi, 1999; Pearson, 1997). The media sensationalized such reports, often missing information regarding who initiated the violence, if the violence was committed in self-defense, if injuries resulted from such violence, or if the violent acts differed by gender (S. L. Miller, 2001; Osthoff, 2002; Saunders, 2002). Research reviews that have evaluated studies citing women's use of violence in intimate relationships reveal that they often fail to contextualize the violent event, use inappropriate measurement scales, and employ inadequate questions in survey instruments (Kimmel, 2002; Saunders, 2002; see also Dasgupta, 2002, pp. 1370-1371). Indeed, scores of published theoretical and empirical work have demonstrated a failure to portray accurately a pattern of battering as distinguished from a one-time "hit" (Currie, 1998; R. P. Dobash, Dobash, Cavanaugh, & Lewis, 2000; Kimmel, 2002; Renzetti, 1999; Saunders, 2002).¹

In particular, the suggestion of so-called mutually violent couples originates from the findings of three nationally representative surveys of households of married or cohabitating couples that ask respondents about family violence in the context of conflict resolution (Gelles, 2000; Gelles & Straus, 1988; Straus, Gelles, & Steinmetz, 1980). Straus and his colleagues (1980) developed the Conflict Tactics Scale (CTS) and the revised version, the CTS2 (Straus, Hamby, Boney-McCoy, & Sugarman, 1996), which contains 39 questions about violent and nonviolent behaviors, each perpetrated and experienced, with finer distinctions made about minor and serious violence than the original CTS and an effort to include items that attempt to measure the consequences of violent events. Despite the measurement improvements associated with the CTS2, the scale continues to be criticized for counting violent events without providing information on the meaning and motivation of the event; that is, it does not distinguish aggressive or instigating violence from self-defensive or retaliatory violence (DeKeseredy & Schwartz, 1998). Without providing such distinctions, it falsely gives the impression that men and women are equally violent in intimate relationships (R. P. Dobash, Dobash, Wilson, & Daly, 1992).

The most often used and accepted description of what makes the use of force *battering* encompasses the dynamics of a relationship where one partner, usually the male in a heterosexual relationship, uses coercive controlling tactics along with systematic threats and the use of violence to "exert power, induce fear, and control another" (Osthoff, 2002, p. 1522; see also Worcester, 2002). The cumulative effects of such bat-

tering and the desired consequences (i.e., does the victim live in fear of her safety?) are inextricably related. Johnson's (1995, 2000; Johnson & Ferraro, 2000) work distinguishes between four distinct patterns of intimate partner violence, patterns that address the degree of control that motivates the use of violence (Johnson, 1995, 2000). *Common couple violence* encompasses relationships in which both partners use violence in a specific situation and the violence is of relatively low frequency, unconnected to control and unlikely to escalate or involve serious injury. The *intimate terrorism* pattern is one in which violence is one tactic in a general pattern of control and is more frequent, less likely to be mutual, and more likely to escalate and result in serious injury. *Violent resistance* is used primarily by women and is not motivated by control. In addition, in relationships characterized by *mutual violent control*, both partners are violent and vying for control. Research demonstrates that women rarely are the batterers in relationships, or in Johnson's terminology *intimate terrorists*, even if they—and many do—engage in hitting their partners (Dasgupta, 2002; Hamberger & Guse, 2002; Johnson & Ferraro, 2000; Kimmel, 2002; Stark & Flitcraft, 1988). However, research suggests that when women do use violence against their partners, it is almost always in response to ongoing battering (Dasgupta, 1999, 2002; Dekeseredy & Schwartz, 1998; Hamberger & Guse, 2002; S. L. Miller, 2001; Osthoff, 2002).

Connections to Changes in Domestic Violence Arrest Policies

Jumpstarted by grassroots activism, augmented by lawsuits launched against police departments by victims for 14th Amendment violations on equal protection grounds, the criminal justice system has transformed the way that it historically responded to domestic violence. What had once been treated as the most private of intimate struggles was exposed to the scrutiny of public discourse (Iovanni & Miller, 2001; Schechter, 1982). Early research conducted by Sherman and Berk (1984a, 1984b) suggested that arrest was a more effective police response to deter future domestic violence than the common practice of separation and mediation.² The greatest emphasis for change by the criminal justice system was directed at the police, who act as its gatekeepers through their decision making and action (or inaction) as first responders to domestic violence calls. Many jurisdictions have enacted mandatory, pro- and preferred-arrest policies to assert publicly that battering is a serious crime that will be enforced, to empower and protect victims, and to create uniformity with the hope of ensuring an end to selective enforcement based on race, class, or other extralegal variables. As a consequence of these criminal justice policy changes—many jurisdictions created prosecution “no drop” policies too—more arrests of domestic violence perpetrators have been made, and with these increases, women who are battered have been arrested as well, in single or dual arrest incidents (Hirschel & Buzawa, 2002; S. L. Miller, 2001; Zorza & Woods, 1994). It is ironic to note, by holding the state accountable for women's safety through changes in law enforcement practices (Dasgupta, 2002), many victims of ongoing battering have ended up with less protection and fewer services and have been labeled as a defendant (see Mills,

1999). The consequences of mandatory arrest policies may be exacerbated for women of color, in part, because they are more likely to fight back (Joseph, 1997; S. L. Miller, 2001; Worcester, 2002; Wright, 2000).³

Some of the increase in arrests of women who are battered may be attributed to the desire to avoid accusations of gender bias. This gender-neutral approach to arrest provides so-called equality by holding perpetrators equally accountable for their actions and demonstrates that the law is being applied fairly (Renzetti, 1999).⁴ The need to dichotomize violent relationship constellations into victim and perpetrator categories is characteristic of an incident-based criminal justice system (S. L. Miller, 2001), where a single act of violence committed by a woman can eclipse an entire history of victimization (Osthoff, 2002). Moreover, research shows that women more readily admit their violence than do men (R. P. Dobash et al., 1998); women have less to hide and fear from the criminal justice system and are less savvy about its operation (S. L. Miller, 2001). Moreover, women are not socialized to use violence, so they remember every incident (Dasgupta, 1999; Kimmel, 2002). These tendencies backfire for women but may fuel the perspective that women are mutually combative and violent in relationships.

Among practitioners and scholars, the consensus is that battering must be explored and evaluated in context, looking at the motivation, meanings, and consequences involved (cf. three special issues of *Violence Against Women*: Vol. 8, No. 11, 2002; Vol. 8, No. 12, 2002; Vol. 9, No. 1, 2003). Protocols or statutes that encourage the identification of the primary aggressor could address the rigidity of criminal justice system responses and/or better prepare and train police officers (Hirschel & Buzawa, 2002; S. L. Miller, 2001). Starting in 1985 in Washington State, states began to add protocols; 24 states now have predominant and/or primary aggressor assessments (Hirschel & Buzawa, 2002; N. Miller, 1997). Some statutes, such as those in Iowa, Alaska, and South Carolina, instruct officers to consider the history of domestic violence of the parties involved (Hirschel & Buzawa, 2002). Some declines in dual arrests have been attributed to passage of such laws and trainings (see Haviland, Frye, Rajah, Thukral, & Trinity, 2001; Martin, 1997; Zorza & Woods, 1994). Despite the use of primary aggressor protocols, in other jurisdictions, Jones and Belknap (1999) and Buzawa and Hotaling (2000) found that officers may be discouraged from arresting women as sole perpetrators, so they arrest both parties. A discussion about women's use of violence is incomplete without mentioning the forces of backlash that view the controversy surrounding female arrests as so-called proof of gender bias against male victims that has been minimized or denied by the feminist advocacy movement (Burroughs, 1999; Cook, 1997; Pearson, 1997). Some men's rights groups claim that society is reluctant to believe that women are violent toward their male partners and that so-called militant and victim feminists drop their support for mandatory arrest laws when they sweep up women (Blumner, 1999; S. L. Miller, 2001). This antifeminist stance is strongly supported by men's rights groups, the male members of which are typically joined by their second wives (Hart, 1999; S. L. Miller, 2001).

Women's Use of Violence in Relationships

Although there is a dearth of research about typologies characterizing women who use violence in intimate relationships, the studies that explore women's use of force generally agree that most women are victims who engage in self-defensive actions (Hamberger & Guse, 2002; S. L. Miller, 2001; Saunders, 2002). For instance, in their Wisconsin study of women arrested for domestic violence and court mandated for treatment, Hamberger and Potente (1994) found that most of the women were victims of battering who used self-defense or retaliatory violence. Likewise, a 1986 study by Saunders (1986) found that 71% of women who were battered and arrested used self-defensive violence. In other words, women's use of violence within relationships is typically part and parcel of their ongoing victimization, using force to either stop or escape violence (Barnett, Lee, & Thelan, 1997; Browne, 1997; Dasgupta, 1999, 2002; R. E. Dobash & Dobash, 1979, 1992; Feld & Straus, 1989; Hamberger, 1997; Hamberger, Lohr, & Bonge, 1994; Hamberger, Lohr, Bonge, & Tolin, 1997; Hamberger & Potente, 1994; Johnson & Ferraro, 2000; S. L. Miller, 2001; Saunders, 1986, 1988, 2002; Vivian & Langhinrichsen-Rohling, 1996). However, self-defense use alone does not explain the full story of women's violence. Legal definitions of *self-defense* "may not explain all instances of a woman's use of physical force, especially when there is no apparent 'imminent' threat to her bodily integrity" (Dasgupta, 2002, p. 1372). For instance, the Duluth model, which bears the name of the first male batterer intervention program and is one of the most well-established and respected programs designed for male batterer intervention, combines behavioral psychology and feminist theory to educate batterers on a variety of topics to reduce future violence and abuse.⁵ Their manual highlights three categories that characterize women's use of violence (Hamlett, 1998): self-defensive violence to escape or protect themselves from abuse; protective violence by women with long victimization histories, including childhood and prior relationships, who use violence to decrease chances of victimization; and primary aggressors, who are women who use violence to control their partners.

Other studies that explore motivations for violence committed by women who are battered include retaliation or punishment for past hurts, attempts to gain emotional attention, expressions of anger, and reactions to frustration and stress (Bachman & Carmody, 1994; Dasgupta, 1999, 2002; Faith, 1993; Follingstad, Wright, Lloyd, & Sebastian, 1991; Gonzalez, 1997; Hamberger et al., 1994, 1997; Lillja, 1995; Straus, 1999). In addition, women's use of violence can be related to lack of social support and lack of perceived or real options (Barnett, Martinez, & Keyson, 1996; Saunders, 2002; Wilson, Vercella, Brems, Benning, & Refro, 1992). Dasgupta (2002) warned that it is risky to dichotomize women's motivations as either self-defensive (and thus legally excusable and socially approved) or retaliatory (which identifies women as the initiator and thus legally punishable).

Another limitation to understanding women's use of force is that few empirical studies have examined the daily experiences and perceptions of criminal justice per-

sonnel and social service providers who process women arrested on domestic assault charges. S. L. Miller's (2001) research revealed that advocates (shelter workers, victim advocates, treatment providers, family court advocates) and criminal justice personnel (probation officers, police, prosecutors, public defenders) did not believe that women's use of violence was increasing, nor did they believe that most women who were arrested were batterers in the true sense of the word (e.g., the women did not have the same kind of power over men that men possess in relationships with women; the men were not in fear of their lives; if the men wanted to defend themselves, they could easily do so). S. L. Miller's respondents believed that the criminal justice system was easily manipulated by (male) offenders who were familiar with the process, including men challenging a woman's right to trial (rather than accepting a guilty plea) by claiming she would lose her children if she lost at trial and went to jail; men self-inflicting wounds so that police would view the woman as assaultive and dangerous; men being the first ones to call 911 to proactively define the situation; and men capitalizing on the outward calm they displayed when police arrived. The research also demonstrated myriad criminal justice system-related problems, including overenforcement of proarrest laws while failing to determine primary aggressors (resulting in dual arrests), women's limited knowledge of their options and their powerlessness in the process (resulting in accepting guilty pleas without full appraisal of the consequences; see also National Clearinghouse for the Defense of Battered Women [NCDBW], 2001), and women who had long histories of victimization mandated to attend batterer intervention programs (S. L. Miller, 2001).

Drawing on important work developed by the NCDBW (2001), Hirschel and Buzawa (2002) raised other consequences faced by women who were battered and arrested, including losing "all the rights and privileges attendant to the victim determination, such as transportation to a safe location, temporary housing in a shelter for battered persons, issuance of a restraining order, and participation in victim assistance and empowerment programs" (p. 1459). Employment may be lost, resulting in financial hardship. Women may lose custody of children and may develop a reluctance to report subsequent abuse to authorities despite a possible increase in danger from the abuser (Hirschel & Buzawa, 2002). The surreal position of being a woman who is battered who is formally processed as an offender exacerbates feelings of confusion and powerlessness; being mandated to a batterer intervention program, especially one designed for male abusers, only increases this absurdity.

Treatment Programs

One component of the social, legal, and political activism designed to address battering was the development of treatment or intervention programs for abusers, overwhelmingly designed for (heterosexual) men. These programs divert offenders from incarceration while they strive to reeducate and transform male batterers into peaceful, egalitarian embracing partners—a lofty goal for programs whose participants are court mandated, not volunteers. As an unintended consequence of mandatory, preferred, and proarrest policies aimed at deterring domestic violence offenders, many

women who are battered have been arrested and court mandated to a treatment program designed for male abusers (S. L. Miller, 2001).⁶

Domestic violence advocates and scholars express concern about the existence of these programs. Most agree that it is imperative to identify the batterer and to send only that person to a treatment program (see three special issues of *Violence Against Women*: Vol. 8, No. 11, 2002; Vol. 8, No. 12, 2002; Vol. 9, No. 1, 2003). For a woman who has been convicted of domestic violence—regardless of whether her male partner self-injures and then calls the cops (see Osthoff, 2002; S. L. Miller, 2001)—but is a victim of abuse, the use of court-mandated programs seem inappropriate. The view of the NCDBW's executive director is unequivocal: "No one who is not a batterer should ever be required to attend a batterers' intervention program. Ever" (Osthoff, 2002, p. 1536). It is difficult to embrace a program that may label victims as batterers and follow the goals of batterer treatment programs designed to confront male privilege and resocialize participants to be nonviolent (Dasgupta, 2000; also see Pence & Paymar, 1993, for a discussion of male treatment programs).

Moreover, although mandatory and/or proarrest policies aim to eliminate discretion based on race, class, or even gender, it is possible that women who do not conform to gendered notions of a so-called pure or good victim (i.e., nice, delicate, passive), but rather are more "masculine" (i.e., mouthy, aggressive toward police, drunk) are the ones who will continue to face arrest (Gilbert, 2002; Osthoff, 2002). When women use violence, they may evoke different reactions from authorities because their behavior contradicts gender role assumptions of submissiveness (Dasgupta, 2002). Part of this misperception is fueled by the legal system and media's depiction of a woman who is battered as passive and helpless (Ferraro, 2003), so when she does resort to violence, it is scary and surprising, despite studies showing that even the most timid victim of domestic violence can develop clever coping strategies for survival on an ongoing basis (see Campbell, Rose, Kub, & Nedd, 1998; Dutton, 1992; Gondolf & Fisher, 1988). Furthermore, evidence suggests that women who are battered who fight back are still not safe; they may face increased vulnerability to their partner's aggression (Bachman & Carmody, 1994; Feld & Straus, 1989; Gelles & Straus, 1988).

Despite myriad concerns expressed by practitioners and researchers regarding the current so-called trend of establishing batterer intervention programs for women, few studies have been conducted that explore women's interpretations of their experiences in the mandated treatment programs. The current study begins to address this gap.

Examining One State's Treatment Programs for Women Arrested for Domestic Violence

The current study explores one state's experience dealing with women arrested for domestic violence. The results reported here are part of an ongoing, multisite research project comprising multiple jurisdictions. The state is small, with only three counties. The police departments do not follow mandatory arrest policies but rather operate with proarrest policies reflecting considerable variation across state, county, city, and

local police departments.⁷ In the mid-1990s, all three counties began operating programs to address the influx of women who had been arrested on domestic violence charges and mandated to treatment programs. Victim advocates, joined by some criminal justice professionals, raised concerns about the increase in women being arrested and felt that in many cases the arrests were a function of the state's strict arrest policies, rather than reflecting any real increase in women's use of violence (S. L. Miller, 2001).

Method

Following months of conducting interviews with criminal justice professionals and social service providers throughout the state (see S. L. Miller, 2001), we recognized that the voices of the arrested women themselves had to be heard to place the perceptions and experiences of criminal justice and advocacy professionals in perspective. Although we sought admittance to treatment programs in all three counties, final permission was obtained in only two counties. These two counties incorporate urban and rural residents. The treatment programs are offered under the auspices of a treatment agency, with a total of three separate groups operating each week. All three groups follow the same philosophy and format; they are offered at different times (day and evenings) and locations to increase accessibility for women who work, have child care responsibilities, and/or must travel some distance to attend the programs. In the 6 months of program observation, only one woman was not court mandated to the program as a condition of her probation. Therefore, with one exception, all the women were required to successfully complete the Female Offender's Program⁸ (FOP) as a condition of probation. In addition, several women were mandated to the treatment program through the Division of Family Services as a condition of child custody arrangements.

Sample

Treatment groups were observed for 6 months, beginning in February 2000 through August 2000. The FOP mandates a 12-week commitment from participants.⁹ It allows for open enrollment whereby women could start treatment any week rather than wait until a new group formed, affording us the opportunity to observe a larger number of women than might otherwise be possible. Ninety-five women participated in these programs during the months of observation. On a weekly basis, the size of a group varied between 5 and 11 women. This open enrollment strategy also meant that women who were in various stages of the treatment process were able to raise different issues and offer different insight into the weekly discussions, with many of the longer term participants offering emotional and practical support for the newcomers.

Of the participants, 58 were White, 29 were African American, 2 were Latina, and 6 others did not provide this information.¹⁰ Nearly all of the women had at least one child. Many had substance abuse and/or alcohol issues; often they were simultaneously ordered to treatment programs for drugs or alcohol. It was common that a par-

ticipant's male partner (current or ex-) was ordered simultaneously to a batterers' treatment program for men; in these two counties, the treatment programs for men were conducted by the same organization using different facilitators.

Program Philosophy and Structure

The FOP follows a feminist philosophical tradition that seeks to empower women by raising issues and conducting group discussions to encourage self-realization. The curriculum includes group discussions, video viewing, worksheets to read, homework assignments and, at times, role-playing. The female facilitator, Mary,¹¹ holds the women accountable for their behavior, pointing out that they made choices to respond or act in a way that facilitated their arrests. However, she did not focus on labeling women as victims or offenders; rather, she focused on accountability, options, and choices, leaving the personal designation (of victim or offender) up to each participant.¹² Understanding and transforming old behavioral scripts or patterns are program goals. In addition, she saw the group as an avenue to create greater awareness of self and the larger fabric of the women's daily lives; Mary provided information on local support services and answered legal issues to further these goals. Many of the women face other life stressors, such as employment in low-skilled jobs, unemployment, transportation and housing issues, primary responsibility for child care, and ongoing substance abuse issues. Without excusing the use of force or ignoring the law broken, the facilitator contextualizes the women's use of violence and the institutional responses by the criminal justice system (and others) to their actions. For these women, this therapeutic style seems effective for it empowers the group members while remaining cognizant of the pushes and pulls the women feel toward their partners, family members, and other important people in their social networks and the criminal justice system. Using similar words as quoted below, Mary stated the following in every group session:

We [the counseling agency] want the fighting stopped. That's why we have this class. You have the power; the only person you can control is yourself. You can't control your partner. . . . You can control your own behavior. You make choices. If you're in an unhealthy relationship, then you need to get out because you can't fix it, you can only fix yourself. Who are you? Are you the person who has been doing the abusing? Or are you a victim who has fought back? Or are you a woman who is violent to everyone? (May 1, 2000)

Mary exercised the option of terminating a participant from the program if she was rearrested or failed to adhere to the group's conditions. Mary can also extend a member's length of participation, usually by 6 weeks, if she felt the member had not absorbed the curriculum. The women cannot minimize their actions because the facilitator holds their case file, which includes the charges and the probation officers' descriptions of the incident. Mary worked in tandem with members' probation officers and recommended extending the program or presented accolades to the probation officer about the members' progress.

Analysis

Group sessions were tape-recorded and later transcribed.¹³ Transcripts were coded using grounded theory methods, and patterns in the data were identified as they emerged. Following grounded theory methods, themes were utilized only if they were discussed at length by at least three respondents (Lofland & Lofland, 1995). The data were examined using coding techniques described by Strauss (1987). Each transcript was read exhaustively and analyzed into emergent conceptual categories. When no new conceptual categories were unearthed, saturation was believed to have been achieved (Krueger, 1994). This article discusses three violence categories that emerged from the data. We relied on intercoder reliability methods in that both authors independently coded the incidents; there was virtually no disagreement over the categorization.

Findings

It is important to recognize the importance of listening to women's stories and using women's own perceptions and descriptions of their experiences as the context for understanding issues related to policy decisions and implementation. We profile three different categories of violent behavior used by women in the treatment groups.

Categories of Female Offenders

Three different types of behavior were identified that led women to be arrested on domestic violence charges: generalized violent behavior, frustration response behavior, and defensive behavior. The first category, generalized violent behavior, included women who used violence in many circumstances, not just in intimate relationships, such as against neighbors, other family members, strangers, or acquaintances. This also accounted for the smallest number of women, 5, comprising about 5% of the program's total clients. We selected a representative "slice" of the members of this category's stories by describing four incidents that fit into this category in the 6 months of attending three different groups' treatment sessions. What was unique about this group of female abusers or "perpetrators" was that the nature of their violence differed from what is typically associated with batterers. A batterer uses violence as a vehicle for getting his or her partner to do something. Often, the batterer operates with a sense of entitlement and uses violence as a way to punish or control a partner.

However, from what we observed, the women who used or threatened to use violence against intimate partners or others did not have control or power over their targets. The women were not able to control or change anyone's behavior; in fact, the victims did not fear them nor change their behavior out of a sense of intimidation—responses that would be typical in a scenario with female victims abused by men. Linda's case typified this category. Linda was mandated to treatment based on three violent episodes; her current offense involved threatening a female neighbor for park-

ing too close to her truck. Prior to this, Linda had attacked her wheelchair-bound uncle during a family quarrel and attacked her live-in boyfriend because of jealousy over another woman (April 14, 2000). She did not believe that her violence changed anyone's behavior to her satisfaction. In group, Linda was argumentative and nonapologetic.

Another example is Tyra's story. Tyra and her husband were separated at the time of the incident, and Tyra had a drug addiction. Although she never physically hit him, she was arrested for terroristic threats. Tyra did not have a history of victimization and freely admitted that her husband, although emotionally distant and a workaholic, was not physically abusive. Here is how Tyra described the incident that brought her to the group:

Tyra: I went out partying and never came home and my husband was a little upset, and I threatened him.

Facilitator: You threatened him? What did you threaten him with?

Tyra: That I was gonna get somebody to come there and kill him. I didn't strike him or nothin'. But he called the cops. The next day, they came to my work. I ended up with a year probation, this program, and drug counseling. (July 6, 2000)

Tyra saw this as a wake-up call and now attends Alcoholics and Narcotics Anonymous; she and her husband are attempting reconciliation.

Another example of violent behavior, which followed a long history of victimization, is Dawn's story. Dawn and her husband have two children together; his abuse began when she was 5 months pregnant with their first child. In the past, he had choked her, beat her, held guns to her head, threatened to kill her, and drove cars at dangerously high speeds without letting her out. She had a civil protection order against him from one state; however, he followed her to a contiguous state. Her mother and other family members encouraged her to try to make the marriage work, and they did reconcile; months later, she was pregnant with their second child. She left her son in his care; however, when she came home, her husband was snoring on the couch while her son was screaming and crying; he mocked her and refused to answer any questions about their son. In the past, after he was violent and she called the police, he ran to the woods and hid, so he had never actually been arrested. Suspecting the worst, afraid for her own safety, and mad as hell, she ordered him out of the house. Here are her words:

I went to the kitchen, I got a knife and threatened to kill him from the other side of the door. I didn't know what I was doing with the knife 'cause I really didn't want to hurt him, but he went to grab for my hand and when I switched the knife over, it cut his thumb. He got that cleaned up, and he went down to the gas station and called the police on me. They came and asked me if I had cut him. Actually, they said "stabbed" him. He also had lacerations on his chest and his back. I have no idea how they got there. I know that I didn't do it with the knife. But they charged me with possession of a deadly weapon and assault in the second degree. They put me in handcuffs in front of my son. (June 12, 2000)

The final example from the group sessions involved Sandra Lee and her second husband of many years. She described herself as a battered wife in her first marriage, as a target of her current husband's abuse for more than 10 years, and that both of them had serious drug addictions to cocaine and valium. She was arrested for endangering the welfare of a child because her daughter was present at the time of the following incident:

I was using cocaine, valium, and blacking out periodically. I went to get some more while he was out of it [from the drugs]; we had been fighting all weekend, and I am not a violent person. But he started on me, and I guess something just snapped because he wouldn't give me the car keys. I don't really remember all of what happened; I had had a lot of valium, and I took a knife out of the kitchen drawer and my intent was to slit the tires on the car, but I went after him instead. When he seen me in that state, he took the knife out of my hands, and he flipped out. My daughter was in the house. She flipped out. He called 911, and I was arrested and charged and the Judge sent me to [a residential drug treatment center] for 17 days. (May 1, 2000)

When Sandra Lee came home, she was clean and sober and found another woman with her husband in her house. She responded calmly, telling the woman to leave and telling her husband to pack his bags and get out. Then she took her daughter and went to stay with her mother. She remains in recovery, attending substance abuse sessions four times a week, and she and her husband are separated; he remains a user.

These examples suggest that far from being a batterer in the conventional sense of the word as described earlier in this article, these women used violence in response to an immediate incident, and the consequences were negligible. They did not establish or reestablish control or power over their partner or former partner as a result of their actions. Only one woman had a long history of victimization. In three of the four cases, violence was not directed solely toward a partner (one involved threats; another was violent toward three people; another threw an object). Again, it is important to note that only five women from the 6 months of data collection fell into this category.

Approximately 30% of the women comprise the second category, frustration response ("end of her rope") behavior. These women often had histories of domestic abuse in their backgrounds—with their current partner or in an earlier relationship—and reacted violently when nothing else seemed to stop his behavior. Typically, the women responded to stressful situations or encounters with partners that might lead to a mutually violent episode. These women were different from the first category of offenders (generalized violence) because they overwhelmingly exhibited violent behavior with a partner who was abusive (emotionally, sexually, physically) toward them as opposed to a more generalized use of force. In some cases, the man was the primary aggressor; however, nonetheless the woman responded with violence.¹⁴ The case of Kelly exemplifies this frustration response category. Kelly left an abusive 16-year marriage with Tim. When her new boyfriend, Gerald, started becoming emotionally abusive, she flashed back to what emotional abuse had symbolized in her marriage, which was traumatic; Tim's emotional abuse had typically led to sexual abuse

and physical battering. Kelly began hitting her boyfriend with both hands, causing no injury, and a neighbor called the police to report the noise.

Another example of a case involving a stressful situation in which there was no known history of abuse is Sheila and Bobby. Sheila and her husband, Bobby, were drinking at a local bar. He was flirting and dancing with another woman that Sheila knew. Sheila got up on the dance floor and punched Bobby on his shoulder and threw her drink at him. Although her actions caused no injury, Bobby was humiliated in front of his friends; his brother called the police.

Eunice's situation mirrors these examples. In her words,

I was charged with offensive touching. My husband and I got into an argument one night because the baby had a diaper rash and it was really, really late, and he didn't feel like it was important to get the diaper rash medicine and I did, and we got into an argument and it escalated. There was a lot of yelling involved and then I said that I was going to leave with the baby, and he didn't want me to so he was standing there in front of the door, and I tried to move him out of the way. I scratched him. [Facilitator: How did you scratch him?] With my nails. And someone heard the yelling and called the police. The police showed up and then I was charged. (June 12, 2000)

Again, what Eunice's story reflects is a physical response to a frustrating situation that involved potential harm to her child.

Sunny's experience is our final example for this category. From the time that she was 14 years old until she turned age 24 years, she was a victim of many beatings (father, stepfather, boyfriends). Her current husband physically assaulted her for the past 2 years, and she said, "I got to the point that . . . if you are gonna put your hands around me, choking me, or throwing me out of the car, I am not taking it no more." Although they reconciled after he beat her up—because her mother would no longer let Sunny and the children stay with her—the incident that led to her arrest involved her pushing him out of the doorway when she was trying to leave because he was smoking pot in front of her three kids. Her house had become a drug hangout for her husband's friends, and she did not want her kids to be raised in a negative environment. Despite her fear of his violence, she attempted to leave before any violence erupted because he was only being verbally abusive toward her and their handicapped child. Sunny decided that her children's safety was more important than "obeying" her tyrannical husband, so in this instance, she risked his anger and violence in making her decision to leave.

For these women, their use of violence did nothing to change the abuse and power dynamics of their relationships. Without analyzing options or planning ahead, the women in this category responded to a violent environment with force, with much of the present situation being reminiscent of past abuse in their lives. The women's use of force suggests a playing out of older patterns in which they learned to use force as a reaction to conflict. In general, these women expressed that they had no other options—they either had not received or had not asked for help from the criminal justice system or their social support networks during earlier abusive incidents. They

used violence as an expressive tool to demonstrate their outrage or frustration over a situation to which they felt powerless.¹⁵

The final category, defensive behavior, comprised the majority, or about 65%, of the women. Women who exhibited defensive behavior were trying to get away during a violent incident or were trying to leave to avoid violence when they knew their partner was about to become violent. In many cases, particularly when there were children at home, the women were not able to get away; typically, a woman's violence occurred after her male partner was the first to use violence. When women perceived their children were in danger because of the men's violence, they acted violently toward the men in an attempt to make them desist. The violence used by women, then, was in response to either an initial harm or a threat to them or their children. Examples of women in the defensive category include Tonja and Gail.

Tonja's boyfriend had her in a choke hold as he attempted to strangle her. She bit his arm to get him to loosen his grip, so she had a chance to get away from him. In Gail's incident, her husband Randy was drinking too much at home, and Gail wanted to leave before it got violent as it had in the past. Randy blocked the doorway so she could not leave, so Gail scratched him and pushed him away.

Becky endured severe beatings from her boyfriend for approximately a year, including broken ribs that caused so much pain she was unable to walk. She said "I got to the point where I fought back at times, blocking parts of my body so that he wouldn't hurt me so bad" (February 10, 2000). For Jennifer, her abusive, drunken husband came at her when she had her child in her arms, so she "poked him in the forehead" and then found herself arrested for offensive touching (February 14, 2000). Patty returned to her abusive husband after a 2-month separation; he begged her to come back after he was shot by a drunken friend, so she decided to try to make things work, and they went out partying on his boat. When they got back home, her mother-in-law was there; they don't get along, so Patty tried to leave. Here is her description:

I tried to leave but he doesn't want me to leave, but I walked out the door, and he jumps on me. I hopped in my car, and he moves behind my car and in front of my car and tries to break into the windows with a stick. So I tried to put my car in drive and pinned him up against the garage wall. I didn't realize what I was doing until he looked at me and said, "Patty, please go." I felt like total shit. I put my car in reverse and just left. (February 17, 2000)

Patty was arrested the next day for assault with a deadly weapon and assault with intent to harm. Facing a possible jail term of 25 years, she hired an attorney and pled guilty to a lesser charge, received probation, substance abuse treatment, and the FOP.

Wendy's experience mirrored many of the women in the group. Her ex-husband was abusive, striking her and her son (by another man) for the several years they were together. As Wendy described it, "He was pushing and beating on me and he would beat up my son all the time just because he [the son] was at home. He did drugs in front of them [her children]. I got sent to jail for not doing anything, for child endanger-

ment." When she got out of jail, she found him at home with another woman. She was angry that she had been jailed for 3 days.

He started pushing and hitting me again, so I just hauled off and I struck him. And then I heard the cops come. My daughter had called the cops, and she said he is biting me mom. When the cops came, she told them to help me, but they let him tell the story instead. They saw that I had just come from jail. (April 14, 2000)

Although her ex-husband had been physically abusive to her and the children, Wendy had never called the police or filed a protection order, so there was no paper trail that designated him as the batterer. The police did not investigate the circumstances of the prior arrest, the shared history, or the current incident.

Terry was with her boyfriend as he drove his car. They were engaged in a verbal argument in which he accused her of flirting with and maybe sleeping with another guy. He began punching her as he drove. He accelerated, so she could not jump out. He grabbed her and put his arms around her neck in a choke hold, pulling her hair, and almost strangling her so that she could scarcely breathe. Terry bit his arm to force him to stop choking her. Despite the marks around her neck and that her hair was noticeably falling out at the police station, she was arrested. Terry acknowledged that the police told her that she did not have to plead guilty. However, Terry assumed that it was her fault ("I deserved it") and that pleading guilty and getting the first offender's program would avoid jail time. Terry self-described as someone with a temper who has a lot of pent-up anger. She had a long history of being a victim of abuse. She minimized his actions to the group, saying,

Since I know how he can get, I shouldn't be running my mouth. I have a problem with my mouth. He starts it; I finish it, because I have that much of a temper. I spent all these years trying to argue with someone that there's no sense in arguing with. I should know better.

Quickly, the facilitator interjected with information, trying to put the violence into perspective for Terry:

When someone puts their hands around your neck, they are strangling you. It only takes 7 pounds of pressure on the windpipe to kill you. And it only takes cutting off the oxygen to the brain for death; I think it's 6 minutes for a brain injury and anything under that you can be resuscitated hopefully. (March 20, 2000)

What the above incidents demonstrate is that most women used violence to defend themselves or their children or to escape an impending violent attack, a threat they knew was realistic, given their past experiences with the batterer. The women had long histories of victimization, and most expressed feeling as though they had no choice left but to fight back. Often, their social support networks and/or the criminal justice system had failed to support or protect them. Many lived isolated lives, either geographically exiled in the country or by design of the batterer who cut off the women's contact

with friends and family. Children and drugs and/or alcohol were common factors in the incidents. Often, the women were arrested because the male batterer called the police; however, just as likely another family member at the scene or a neighbor called. In all cases, the women were surprised and outraged at the arrest. The outrage was present because their perception of the situation was that they were defending themselves and/or their children, and often he had not been arrested for beating her at the time of the incident or earlier in their violent relationship.

In sum, what these three paths to arrest indicate is that the truly violent woman is an anomaly. Our analysis reveals that most women used violence to thwart their husbands' or boyfriends' egregious actions, to defend themselves or their children, or because their current situation mirrored earlier circumstances in their lives where they perceived or experienced danger and violence.

Discussion

Many of the women described in the current study typify the very people that the criminal justice system was supposed to help with new domestic violence policies, not hurt by first arresting them, then treating them as perpetrators, and finally mandating them to batterer intervention programs. This is one unintended side effect of relying too heavily on the criminal justice system to be the primary answer to domestic violence (S. L. Miller, 2001; Mills, 1999; Osthoff, 2002). Gender neutrality offered by arrest policies may become gendered injustice (Renzetti, 1999) as women who are not batterers get arrested under laws designed for men who are.

Consistent with the majority of research findings, the female offenders observed demonstrate that most women who use violence do so to escape or stop abuse. We find support for three of four violence categories as introduced by Johnson (1995, 2000) and for the three categories distinguished by the Duluth manual (Hamlett, 1998). Only 5 of the 95 women in 6 months of (often triweekly) treatment group meetings exhibited preemptive, aggressive violence, the category of violence most similar to Johnson's (1995, 2000) mutual violent control type. The remaining 90 women used so-called violence that cannot be characterized as battering, nor could any woman's violence be characterized as intimate terrorism (Johnson 1995, 2000). According to their stories, the women never achieved power or control over their partners or former partners, nor did the men change their behavior as a result of women's use of intimidation. Women's use of violence was either an instrumental act that was primarily used to defend themselves or their children (i.e., violent resistance) or an expressive act that conveyed frustration with an abusive situation that seemed beyond their control. There were no examples of Johnson's final violence category, common couple violence, exhibited in this data; perhaps minor violence unconnected to control did not reach the new arrest threshold under proarrest policies. Although the program facilitator acknowledged women's violence that precipitated their arrests, anger and use of force were explored in a much larger context, with practical alternatives and coping strategies emphasized.

Women's articulation of their own behavior provides insight into gender differences regarding the use of violence. The women in treatment readily took responsibility for their behavior; however, their acknowledgment differed considerably from that of men in that, according to research on male batterer treatment groups, men typically minimize and deny their violent behavior (R. P. Dobash et al., 1998). Women, on the other hand, freely admitted their role and actions, admissions that may have initiated police proceedings against them in the first place. When group members were asked if they considered themselves "victims, offenders, or survivors," the majority put themselves in the survivor category, after explaining that they knew they broke the law; however, many had endured long histories of victimization or were defending themselves or their children. Again, this self-labeling differs from men who batter. Women couched their experiences in terms of morality: They knew the act was wrong but did not think it was illegal. When they learned that there were laws against the actions they took, the women uniformly acknowledged that they broke the law but believed their actions to be morally justifiable, given the circumstances of their situations. In contrast, men often simply deny the illegality of their actions and project responsibility onto the women or deny the abuse altogether (Kimmel, 2002).

The analysis of the group sessions revealed that the meanings and roles that anger—and sometimes violence—played in women's lives were explored to a much greater extent than an explicit focus on the act that got them arrested. A large part of the program was devoted to guiding the women to recognize what triggers their anger and how to appropriately redirect such feelings so that they are constructive and not destructive. Through resource information exchange and active member participation in discussions, women received invaluable information about how domestic violence affects family life, how to get help so that women do not feel isolated or without options, and how to understand and negotiate the criminal justice system. It was clear from the participants' evaluations at the end of their program that they achieved insight and that they felt more empowered and better able to deal with the frustrations and issues in their lives. For this sample of women who had been arrested, and in the sample studied by Hamberger and Potente (1994), women responded positively to the programs and wanted to learn techniques for taking responsibility, not blame, for their own behavior and to seek nonviolent ways to ensure the safety of themselves and their children. Both programs offered information similar to that provided in shelters, yet most of the women who were court mandated had not been exposed previously to these resources through residential or community outreach programs.

Given some of the positive feelings and experiences the women attributed to the group sessions, it would be accurate, in a sense, to say that they benefited from attending the FOP. However, this concession introduces a dangerous slippery slope. Although ostensibly a so-called offenders program, this particular agency's philosophy, the facilitator's orientation and background in victim services, and the program's curriculum coalesced to produce a nascent victim-centered program. This makes sense, given that most (95%) of the participants were not batterers; and, in fact, a victim-centered emphasis is consistent with extant research findings. However, the program's format may not address what the courts intended, despite the appropriateness of the

curriculum. This particular treatment program emphasized context—the meanings, motivations, and consequences of the acts and how they shaped and constrained women's choices. Not all female offender programs would validate women's experiences and have the foresight to explore the use of violence within the full context of women's lives. For instance, other programs in the same state, or across the country, might follow a very different philosophy that is incident driven and thus more in line with typical criminal justice system practices. An incident-driven treatment group that fails to contextualize women's use of force would define, treat, and address women as perpetrators or batterers. Endorsing this kind of program is risky in that it is never appropriate to send a victim to a treatment program designed for batterers. Contextualizing women's use of violence is of paramount importance, given prior research findings and what the current analysis reveals. It is ironic to note, this contextualizing occurs at the wrong end of the criminal justice process; it should begin when police are initially called to a domestic violence incident rather than at the culmination of case processing.

Given the criminal justice system's focus on offenses and not on relationships or the contexts in which the violence occurred, these cases are easy to prosecute. As demonstrated in these data and elsewhere, women tend to tell their stories with much detail (e.g., exactly where they hit, how hard they hit; see McMahon & Pence, 2003). Compared to men arrested on domestic violence charges, women who are arrested are less likely to demand that attorneys argue their innocence to get them acquitted (George & Wilson, 2002). This collusion, albeit unknown to the women, feeds right into an incident-driven criminal justice system. Unfortunately, it was almost solely in the treatment groups where the context of the incident and its consequences were addressed: How would the arrest affect the women's lives?

For most of the women, the criminal justice process was alienating and foreign to them. Because the women feared jail or loss of custody of their children, it was often easier to accept a guilty plea than contest the arrest. It is a sad commentary that the bulk of the women's legal understanding was gleaned after the fact, in the treatment groups, rather than at earlier decision-making points where the information could have had a greater impact on the women's decisions. Desperate to resolve the familial, employment, or financial crises posed by a conviction, women were eager to accept the choice of pleading guilty and enrolling in the FOP in lieu of jail. However, because women court mandated to treatment are placed under the Probation Department's auspices, women are at risk for violations, which can be orchestrated by manipulative batterers who could cause the women to be late or miss sessions, especially by failing to fulfill child care or transportation commitments. In addition, there remains a coercive element to female offender programs: The women must attend and participate in the group discussions and do homework assignments¹⁶ or their probationary status could be rescinded, with jail time a potential outcome. The context of the relationship in which the use of force occurred fails to get addressed when offenders are diverted from scrutiny by the criminal justice process into treatment programs, leaving treatment groups as the sole forum to examine issues of self-defense, fear of retaliatory violence, and so on. This net widening has far-reaching implications. Because many

organizations that develop treatment groups may not be as forward minded in their approach as the ones analyzed in this article, there is a huge danger of continued reliance on incident-driven solutions that disingenuously designate all women arrested on domestic violence charges as batterers.

Clearly, more work needs to be conducted to evaluate existing legal practices while remaining focused on the gendered differences in the use of force within intimate relationships.

Dasgupta (2002) suggested using an ecologically nested model for understanding violence, one that encompasses macro-level interactions of social, historical, and institutional variables, as well as individual-level (micro-level) factors (see Bronfenbrenner, 1977, 1979, 1986, for general discussions of this model; for how it is used in the domestic violence context, see Edleson & Tolman, 1992; Heise, 1998; Lischick, 1999; Perilla, Bakeman, & Norris, 1994).

The four interactive levels proposed by this model are as follows: (a) the individual level that considers a person's childhood socialization, past experiences, and personal perceptions of these; (b) the micro-system level that captures the immediate situation, such as family, workplace, and relationships; (c) the exosystem level that entails the structures and systems of the society in which one lives; and (d) the macro-system level that involves the larger background of group history, culture, and ethnicity. (Dasgupta, 2002, p. 1373)

Although serendipitously and informally, the FOP observed in the current research project explores all of these levels in its curriculum, through the group discussions, worksheets, videos, and homework assignments. By addressing the antecedents of violence, gender roles, and power dynamics in relationships, the FOP is able to richly contextualize the meanings, motivations, and consequences of women's use of violence. It would be interesting to see how programs would more explicitly incorporate the levels of an ecologically nested model into their curriculum. Providing these resources and services at the postarrest stage in the process is laudable; however, it disguises the dire need to offer access and support prior to the arrest incident. As Osthoff (2002) contended, "Perhaps with more options, women would be less likely to use violence (particularly when they are forced to do so in order to defend themselves) and, therefore, would be less likely to get arrested" (p. 1537).

Unmistakably, given the women's experience with the criminal justice system, certain key issues must be reexamined and addressed. The data reveal that women's lack of familiarity with the system, the ease with which their emotions can be manipulated (by abusers or practitioners), and (poor) decisions made based on these emotions create barriers to achieving justice. Victim advocates need to enter at earlier stages in the case process, regardless of whether the women are designated as offenders. Most of the women in the treatment groups expressed anger at police officers' reluctance to "figure out" what transpired that led to the women's use of force. Police can be trained to distinguish acts of self-defense from acts of aggressive violence; and, in fact, evaluations have begun to demonstrate declines in dual arrests in jurisdictions that provide

such training to their officers (see Hirschel & Buzawa, 2002). Prosecutors can play a more directed role in uncovering the context in which the use of force occurred, using their discretion to detect true offenders from victims who fought back. Previous research has recognized that prosecution may not always be the safest and most appropriate response (Mills, 1999), so it is incumbent on prosecutors to fully assess the situation before pursuing cases.

All criminal justice personnel—police, prosecutors, judges, and probation officers—need to be cognizant not only of gender differences in intimate violence situations but also of racial and ethnic differences. Although it was not the case in the treatment groups observed here, other jurisdictions may find that women of color are underrepresented in treatment groups. An underrepresentation could reflect differences in how cases were handled at the postarrest stage, with women of color less likely to be offered the treatment group option. Future research should explore the determinants of jail versus probation and/or treatment options to evaluate whether race-ethnicity plays a role, given the extant research that suggests that women of color and/or impoverished women receive harsher sentences because of fewer resources, language barriers, cultural nuances, and racism (Allard, 1991; Browne, 1987; Hooper, 1996; Osthoff, 2002; Richie, 1996).

Conclusion

An overreliance on the criminal justice system to protect women from domestic abuse has helped create the issues discussed in this article. It is a specious argument to insist that gender neutrality in law enforcement practices succeeds in identifying batterers; this utopian vision conflicts with women's realities in intimate relationships and fails to address the gendered nature of violence itself. As McMahon and Pence (2003) contended, part of this failure can be attributed to the movement away from a critique of the underlying social, legal, and political structures that underpin male privilege and use of violence and toward a more individual focus on the pathologies of offenders and victims, and the intricacies related to practitioners' styles, practices, and specific procedures.

Although some battered women may be helped by court-mandated treatment programs, failing to listen to women's stories about the context of their relationship violence and coercing women to attend batterer groups—presented as gifts in exchange for guilty pleas—replicate the very system of power and control that antiviolence advocates and scholars seek to eradicate. As indicated by the data presented in this article and discussions elsewhere, most women who are arrested for and charged with domestic violence offenses are not batterers. A one-size-fits-all approach to female offenders fails to distinguish between real batterers and victims who use force in self-defense or for other reasons. It is time for some difficult and serious reflection about the appropriateness and potential misapplication of some domestic violence policies. Devising ways to evaluate individuals' actions within the context of their situations is paramount for the criminal justice system to respond in a more just and humane man-

ner. Instituting policies that ignore or fly in the face of women's reality will only serve to increase the alienation and isolation experienced by victims of battering. Adopting a contextually based framework within which to evaluate domestic violence arrests of women will serve to check state power while simultaneously contributing to a more enlightened and efficacious response to women's use of force in intimate relationships.

Notes

1. Although some women use violence in intimate relationships, the consequences for female victims are more injurious and life threatening than men's are (Tjaden & Thoennes, 2000). Women are more likely to be killed (Fox & Zawitz, 2000), and women are 5 times more likely than men to be victimized by spouses, partners, ex-partners, boyfriends, or girlfriends (Rennison & Welchans, 2000). Even when violence is used by women, it may not equalize control or fear in the relationship (see Dasgupta, 1999). Worcester (2002) contended "It is crucial to keep asking who is afraid and who is not safe. . . . We know women can be effective at using emotional control, but whether it takes on the same level of threat to safety and whether the other person lives in constant fear may be a major difference between male and female use of emotional control" (p. 1403). Dasgupta's (1999, 2002) research found women were more motivated to achieve short-lived control over their immediate situation, whereas men's desire was to establish widespread authority for lengthy periods of time. Thus, women's violence rarely produces fear, whereas men's violence often does (S. L. Miller, 2001).

2. According to 2002 statistics, 23 states operate with mandatory arrest for some assault-and-battery domestic violence offenses; 33 states mandate arrest when police determine probable cause exists that restraining orders have been violated (Hirschel & Buzawa, 2002). All 50 states use at least one of these arrest types (Buzawa & Buzawa, 2003).

3. Racial or cultural differences in how women respond to violent partners may affect arrest rates. For instance, Black women often minimize their victimization because of their investment in perceiving themselves as capable of self-defense (Ammons, 1995; Harrison & Esqueda, 1999). It may also be possible that people who live in disadvantaged neighborhoods and experience the stress of poverty and racism may use violence as a survival strategy for self-protective measures (S. L. Miller, 2001). Women of color may be especially hurt by dual arrests as they may be at greater risk for abuse because of poverty, distrust the police, have fewer resources, and are reluctant to further involve the criminal justice system in the lives of men of color (see Sens, 1999). Furthermore, some research suggests that Black mothers are more likely to have their children removed from the home as a result of a domestic dispute than other victims of domestic violence, so they may be more reluctant than ever to notify authorities (Bent-Goodley, 2001). In fact, one study found that Black women were 1.5 times less likely to report their victimization to authorities than their White counterparts (Joseph, 1997).

4. Gender-neutral statutes are also more inclusive of same-sex relationships. Worcester (2002) argued that contextual assessments of relationship violence have long been performed by those working with lesbian violence, for they have "always had to look at how any behavior can be used as power and control, how any behavior can be used as a survival tactic, and the fact that victims may well identify as abusers" (p. 1401).

5. Alternative batterer treatment models, such as Emerge or Amend, in addition to reeducation and skills building, emphasize confrontational, in-depth group counseling aimed at forcing batterers to accept responsibility for their behavior. Victim empathy is also explicitly fostered. Moreover, these programs advocate longer term treatment of a minimum of 36 and 48 weeks, respectively; Amend will even extend treatment up to 5 years in difficult cases (see Healey, Smith, & O'Sullivan, 1998). No research to date has been conducted with female arrestees that compares these different treatment models.

6. For instance, when mandatory arrest was implemented in California, the percentage of women arrested for domestic violence crimes jumped from 5% in 1987 to about 17% in 1999 (Blumner, 1999). In Concord, New Hampshire, the same category increased from 23% in 1993 to 35% in 1999 (Blumner, 1999).

In one county in Minnesota, 13% of women were arrested the 1st year, which rose to 25% in the 2nd year (Saunders, 1995). Hirschel and Buzawa (2002) reported that after the State of Washington implemented mandatory arrest in 1984, dual arrests increased to one third of all domestic violence arrests (see also Martin, 1997; Zorza & Woods, 1994).

7. In 1984, the state code gave police the authority to arrest without a warrant for misdemeanor offenses committed outside the officer's presence. In 1988, the state's Police Chief Council adopted a Model Law Enforcement Domestic Violence Policy, which individual departments were then free to adopt completely or in part. The protocol allows police to retain discretion in misdemeanor cases, as long as the decision not to arrest is fully documented. The protocol does not address the issue of primary aggressor guidelines.

8. The name of this program is a pseudonym.

9. This commitment period differs from the men's 16-week program in the same state. Both programs operate with sliding scales, based on an individual's income. Because women typically earn less than men do, their program costs were often less expensive.

10. Although battering occurs within same-sex relationships, the focus of the current analysis is on heterosexual domestic violence because at the time of the data collection there were no lesbian clients arrested and mandated for treatment who participated in the groups. Lesbian clients have the option to participate in group or individual counseling. Material was presented using references to heterosexual and lesbian relationships.

11. The facilitator's name, Mary, is a pseudonym. All names of group participants are also pseudonyms.

12. If the facilitator believed that any woman was truly a victim, and not someone who used violence, she exercised the option of switching the client to the Victim's Support Group. This option was not always followed, however, because in some instances a male partner (abuser) would not "allow" a woman to attend a Victim's Support Group but would tolerate her participation in a Female Offender's Program. Although the state follows a uniform treatment protocol designed by a representative statewide committee of therapists and social workers who make up these groups, program philosophy can be radically different from one program to another. The protocol used in the two counties loosely follows the feminist treatment model created by the Domestic Abuse Project (1998) in Minneapolis, Minnesota, which believes that most women who are arrested are not the primary perpetrators of violence in their relationships. In addition, the facilitator of the observed groups also facilitated the victim's group for 8 years prior to running the offender's group, thus giving her a solid understanding of the issues that women who are battered face. It is crucial to note that treatment programs would vary according to the facilitator's background and the agency's philosophy.

13. Each time we attended a group session with a new member present the facilitator introduced us, explained the research project, and obtained release forms (via university Human Subjects Review Board [HSRB] protocol). We received unanimous support from members in every group. Although the process used to obtain members' permission might sound coercive (for instance, maybe the women did not feel as though they could decline because they were not in group voluntarily and because we and the facilitator were present when permission was sought), it was explained that the women had options to pursue if they did not want to be part of the research. In addition, we explained to the women that we felt it was crucial to hear from the women themselves about their experiences and not just rely on official records or police reports to "speak" for them. When the women heard this, they were excited to participate, exclaiming that no one else had asked them to tell their stories. At times, we were active participants in the sessions, such as asking the women follow-up questions. They talked to us on an informal basis before and after groups, telling stories about their children, how school or jobs were going, and teasing us about our long car ride home after group.

14. The Domestic Abuse Project in Minnesota designated a similar category to the frustration response category described above, one they call Never Again. This motivation is often characteristic of women who have had long or repeated relationships in which they were battered. They adopted a survival mode of thinking—"no one is ever going to hurt me that way again"—and used violence to decrease their chances of further victimization (Domestic Abuse Project, 1998). The research team did not observe this kind of motivation very often. However, prior abuse often manifests in a mind-set of defiance and a refusal to accept further victimization or abuse.

15. A final observation from the treatment groups seems relevant. After reaching their final session in Week 12, participants were invited to share with the group any comments about how the program had affected them. All but one of the women in the 6 months of observation chose to speak up. Overwhelmingly,

the women spoke of several ways they felt changed by the program. First, the women said they realized they made conscious choices about how to act or react in a given situation: "No one made me do it; I chose to do it." Second, they learned to recognize warning signs of simmering anger in themselves and in new partners and how to handle these signs. Third, the women learned how to make "I" statements so their feelings weren't so "stuffed" inside them (e.g., "I feel unattractive when you make fun of my body"). The women also talked about their new understandings of their right to say no (e.g., to undesired sexual practices, to his so-called rules) and the self-respect and validation that goes along with the ability to say no. And finally, the women discussed strategies they learned to help them deal with situations before they escalate into conflict (e.g., use of time-outs and walk-outs). Thus, it appears that the goals of the treatment group were achieved.

16. The facilitator made allowances for those women who cannot complete homework assignments at home because of ongoing conflict with their partners.

References

- Allard, C. A. (1991). Rethinking battered woman's syndrome: A Black feminist perspective. *UCLA Women's Law Journal*, 1, 191-207.
- Ammons, L. L. (1995). Mules, madonnas, babies, bathwater, racial imagery and stereotypes: The African American woman and the battered women's syndrome. *Wisconsin Law Review*, 5, 1003-1080.
- Bachman, R., & Carmody, D. C. (1994). Fighting fire with fire: The effects of victim resistance in intimate versus stranger perpetrated assaults against females. *Journal of Family Violence*, 9, 317-331.
- Barnett, O. W., Lee, C. Y., & Thelan, R. E. (1997). Gender differences in attribution of self-defense and control in interpartner aggression. *Violence Against Women*, 3, 462-481.
- Barnett, O. W., Martinez, T. E., & Keyson, M. (1996). The relationship between violence, social support, and self-blame in battered women. *Journal of Interpersonal Violence*, 11, 221-233.
- Bent-Goodley, T. (2001). Eradicating domestic violence in the African American community: A literature review and action agenda. *Trauma, Violence, & Abuse*, 2, 316-330.
- Blummer, R. (1999, December 12). Men get slapped around: Who cares? *Sunday Star Ledger* (Newark, NJ), pp. 1, 6.
- Bronfenbrenner, U. (1977). Toward an experimental ecology of human development. *American Psychologist*, 32, 523-621.
- Bronfenbrenner, U. (1979). *The ecology of human development: Experiments by nature and design*. Cambridge, MA: Harvard University Press.
- Bronfenbrenner, U. (1986). Recent advances in research on the ecology of human development. In R. Silbereisen, K. Eyferth, & G. Rudinger (Eds.), *Development as action in context: Problem solving behavior and normal youth development* (pp. 287-308). New York: Springer.
- Browne, A. (1987). *When battered women kill*. New York: Free Press.
- Burroughs, D. R. (1999, March 4). Who has heard of a battered men's shelter? *Delaware State News* (Dover, DE), p. 5.
- Buzawa, E., & Buzawa, C. (2003). *Domestic violence: The criminal justice response*. Thousand Oaks, CA: Sage.
- Buzawa, E. S., & Hotaling, G. (2000). *The police response to domestic violence: Calls for assistance in three Massachusetts towns, final report*. Washington, DC: National Institute of Justice.
- Campbell, J., Rose, L., Kub, J., & Nedd, D. (1998). Voices of strength and resistance: A contextual and longitudinal analysis of women's responses to battering. *Journal of Interpersonal Violence*, 13, 743-762.
- Cook, P. W. (1997). *Abused men: The hidden side of domestic violence*. New York: Praeger.
- Currie, D. H. (1998). Violent men or violent women? Whose definition counts? In R. K. Bergen (Ed.), *Issues in intimate violence* (pp. 97-111). Thousand Oaks, CA: Sage.
- Dasgupta, S. D. (1999). Just like men? A critical review of violence by women. In M. F. Shepard & E. L. Pence (Eds.), *Coordinating community response to domestic violence: Lessons from Duluth and beyond* (pp. 195-222). Thousand Oaks, CA: Sage.

- Dasgupta, S. D. (2002). A framework for understanding women's use of nonlethal violence in intimate heterosexual relationships. *Violence Against Women*, 8, 1364-1389.
- DeKeseredy, W. S., Schwartz, M. D. (1998). Measuring the extent of woman abuse in intimate heterosexual relationships: A critique of the CTS. *Violence Against Women Online Resources*. Available at www.vaw.umn.edu/vawnet/ctscrit.htm
- Dobash, R. E., & Dobash, R. P. (1979). *Violence against wives*. New York: Free Press.
- Dobash, R. E., & Dobash, R. P. (1992). *Women, violence and social change*. New York: Routledge.
- Dobash, R. E., Dobash, R. P., & Cavanagh, K. (2000). *Changing violent men*. Thousand Oaks, CA: Sage.
- Dobash, R. P., Dobash, R. E., Cavanagh, K., & Lewis, R. (1998). Separate and intersecting realities: A comparison of men's and women's accounts of violence against women. *Violence Against Women*, 4, 382-414.
- Dobash, R. P., Dobash, R. E., Wilson, M., & Daly, M. (1992). The myth of sexual symmetry in marital violence. *Social Problems*, 39, 71-91.
- Domestic Abuse Project. (1998). *Women who abuse in intimate relationships*. Minneapolis, MN: Author.
- Dunford, F. W. (1992). The measurement of recidivism in cases of spouse assaults. *Journal of Criminal Law and Criminology*, 83, 120-136.
- Dutton, M. A. (1992). *Empowering and healing the battered woman: A model of assessment and intervention*. New York: Springer.
- Edleson, J. L., & Tolman, R. L. (1992). *Interventions for men who batter: An ecological approach*. Newbury Park, CA: Sage.
- Faith, K. (1993). *Unruly women: The politics of confinement and resistance*. Vancouver, Canada: Press Gang.
- Farrell, W. (1999). *Women can't hear what men don't say*. New York: Tarcher/Putnam.
- Feld, S. L., & Straus, M. A. (1989). Escalation and desistance of wife assault in marriage. *Criminology*, 17, 141-161.
- Ferraro, K. J. (2003). The words change, but the melody lingers: The persistence of the battered women's syndrome in criminal cases involving battered women. *Violence Against Women*, 9, 110-129.
- Fiebert, M. S. (1997). References examining assaults by women on their spouses or male partners: An annotated bibliography. *Sexuality and Culture*, 1, 273-286.
- Fiebert, M. S. (1998). *References examining assaults by women on their spouses or male partners: An annotated bibliography*. Available at www.vix.com/menmag/fiebert.htm.
- Follingstad, D. R., Wright, S., Lloyd, S., & Sebastian, J. A. (1991). Sex differences in motivations and effects of dating violence. *Family Relations*, 40, 51-57.
- Fox, J. A., & Zawitz, M. W. (2000). *Homicide trends in the United States: Intimate homicide*. Washington, DC: U.S. Department of Justice, Bureau of Justice Statistics.
- Gelles, R. (2000, October 12). Domestic violence: Not an even playing field. *The Safety Zone*. Available at www.serve.com/zone/everyone/gelles/html
- Gelles, R. J., & Straus, M. A. (1988). *Intimate violence: The causes and consequences of abuse in the American family*. New York: Touchstone.
- George, L., & Wilson, A. (2002). *Community-based analysis of the U.S. legal system's interventions in domestic abuse cases involving indigenous women* (Unpublished report, National Institute of Justice). (Available from MPDI Inc., 202 East Superior Street, Duluth, MN 55806)
- Gilbert, P. R. (2002). Discourses of female violence and societal gender stereotypes. *Violence Against Women*, 8, 1275-1304.
- Gondolf, E. W., & Fisher, E. R. (1988). *Battered women as survivors: An alternative to treating learned helplessness*. Lexington, MA: Lexington Books.
- Gonzalez, D. M. (1997). *Why females initiate violence: A study examining the reasons behind assaults on men*. Unpublished master's thesis, California State University, Long Beach.
- Hamberger, L. K. (1997). Female offenders in domestic violence: A look at actions in context. *Journal of Aggression, Maltreatment, and Trauma*, 1, 117-129.
- Hamberger, L. K., & Guse, C. E. (2002). Men's and women's use of intimate partner violence in clinical samples. *Violence Against Women*, 8, 1305-1335.

- Hamberger, L. K., Lohr, J., Bonge, D., & Tolin, D. F. (1997). An empirical classification of motivations for domestic violence. *Violence Against Women, 3*, 401-423.
- Hamberger, L. K., Lohr, J. M., & Bonge, D. (1994). The intended function of domestic violence is different for arrested male and female perpetrators. *Family Violence and Sexual Assault Bulletin, 10*(34), 40-44.
- Hamberger, L. K., & Potente, T. (1994). Counseling heterosexual women arrested for domestic violence: Implications for theory and practice. *Violence and Victims, 9*, 125-137.
- Hamlett, N. (1998). *Women who abuse in intimate relationships*. Minneapolis, MN: Domestic Abuse Project.
- Harrison, L. A., & Esqueda, C. W. (1999). Myths and stereotypes of actors involved in domestic violence: Implications for domestic violence culpability attributions. *Aggression and Violent Behavior, 4*, 129-138.
- Hart, J. (1999). Fathers' rights activists plan suit. *Boston Globe*, pp. B1, 5.
- Haviland, M., Frye, B., Rajah, V., Thukral, J., & Trinity, M. (2001). *The Family Protection and Domestic Violence Act of 1995: Examining the effects of mandatory arrest in New York City*. New York: Urban Justice Center.
- Healey, K., Smith, C., & O'Sullivan, C. (1998). *Batterer intervention: Program approaches and criminal justice strategies*. Washington, DC: U.S. Department of Justice.
- Heise, L. (1998). Violence against women: An integrated, ecological framework. *Violence Against Women, 4*, 262-290.
- Hirschel, J. D., & Buzawa, E. (2002). Understanding the context of dual arrests with directions for future research. *Violence Against Women, 8*, 1449-1473.
- Hooper, M. (1996). When domestic violence diversion is no longer an option: What to do with the female offender. *Berkeley Women's Law Journal, 6*, 168-181.
- Iovanni, L., & Miller, S. L. (2001). Criminal justice responses to domestic violence: Law enforcement and the courts. In C. M. Renzetti, J. Edleson, & R. K. Bergen (Eds.), *Sourcebook on violence against women* (pp. 303-327). Thousand Oaks, CA: Sage.
- Johnson, M. P. (1995). Patriarchal terrorism and common couple violence: Two forms of violence against women. *Journal of Marriage and the Family, 57*, 283-294.
- Johnson, M. P. (2000). Conflict and control: Images of symmetry and asymmetry in domestic violence. In A. Booth, A. C. Crouter, & M. Clements (Eds.), *Couples in conflict* (pp. 178-204). Hillsdale, NJ: Lawrence Erlbaum.
- Johnson, M. P., & Ferraro, K. J. (2000). Research on domestic violence in the 1990s: Making distinctions. *Journal of Marriage and the Family, 62*, 948-963.
- Jones, D. A., & Belknap, J. (1999). Police responses to battering in a progressive pro-arrest jurisdiction. *Justice Quarterly, 16*, 249-273.
- Joseph, J. (1997). Woman battering: A comparative analysis of Black and White women. In G. Kaufman Kantor & J. Jasinski (Eds.), *Out of the darkness: Contemporary perspectives on family violence* (pp. 161-169). Thousand Oaks, CA: Sage.
- Kimmel, M. S. (2002). "Gender symmetry" in domestic violence: A substantive and methodological research review. *Violence Against Women, 8*, 1336-1367.
- Krueger, R. (1994). *Focus groups: A practical guide for applied research* (2nd ed.). Newbury Park, CA: Sage.
- Lillja, C. M. (1995). *Why women abuse: A study examining the function of abused men*. Unpublished master's thesis, California State University, Long Beach.
- Lischick, C. W. (1999). *Coping and related characteristics delineating battered women's experiences in self-defined, difficult/hurtful dating relationships: A multicultural study*. Unpublished doctoral dissertation, Rutgers, State University of New Jersey, Newark.
- Lofland, J., & Lofland, L. J. (1995). *Analyzing social settings: A guide to qualitative observation and analysis* (3rd ed.). Belmont, CA: Wadsworth.
- Martin, M. E. (1997). Double your trouble: Dual arrest in family violence. *Journal of Family Violence, 12*, 139-157.

- McMahon, M., & Pence, E. (2003). Making social change: Reflections on individual and institutional advocacy with women arrested for domestic violence. *Violence Against Women, 9*, 47-74.
- Miller, N. (1997). *Domestic violence legislation affecting police and prosecutor responsibilities in the United States: Inferences from a 50-state review of state statutory codes*. Alexandria, VA: Institute for Law and Justice.
- Miller, S. L. (2001). The paradox of women arrested for domestic violence. *Violence Against Women, 7*, 1339-1376.
- Mills, L. G. (1999). Killing her softly: Intimate abuse and the violence of state intervention. *Harvard Law Review, 2*, 550-613.
- Moffitt, T. E., & Caspi, A. (1999). *Findings about partner violence from the Dunedin Multidisciplinary Health and Development Study*. Washington, DC: U.S. Department of Justice, National Institute of Justice.
- National Clearinghouse for the Defense of Battered Women. (2001, February). *The impact of arrests and convictions on battered women*. Unpublished manuscript.
- 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.
- Pearson, P. (1997). *When she was bad: Violent women and the myth of innocence*. New York: Viking.
- Pence, E., & Paymar, M. (1993). *Education groups for men who batter: The Duluth model*. New York: Springer.
- Perilla, J. L., Bakeman, R., & Norris, F. H. (1994). Culture and domestic violence: The ecology of abused Latinas. *Violence and Victims, 9*, 325-339.
- Rennison, C. M., & Welchans, S. (2000). *Intimate partner violence*. Washington, DC: U.S. Department of Justice, Bureau of Justice Statistics.
- Renzetti, C. M. (1999). The challenges to feminism posed by women's use of violence in intimate relationships. In S. Lamb (Ed.), *New versions of victims* (pp. 42-56). New York: New York University Press.
- Richie, B. E. (1996). *Compelled to crime: The gender entrapment of battered Black women*. New York: Routledge.
- Saunders, D. G. (1986). When battered women use violence: Husband abuse or self defense. *Violence and Victims, 1*, 47-60.
- Saunders, D. G. (1988). Wife abuse, husband abuse, or mutual combat? In K. Yllo & M. Bograd (Eds.), *Feminist perspectives on wife abuse* (pp. 90-113). Beverly Hills, CA: Sage.
- Saunders, D. G. (1995). The tendency to arrest victims of domestic violence: A preliminary analysis of officer characteristics. *Journal of Interpersonal Violence, 10*, 147-158.
- Saunders, D. G. (2002). Are physical assaults by wives and girlfriends a major social problem? A review of the literature. *Violence Against Women, 8*, 1424-1448.
- Schechter, S. (1982). *Women and male violence: The visions and struggles of the battered women's movement*. Boston: South End.
- Sens, R. (1999). Between a rock and a hard place: Domestic violence in communities of color. *Colorlines, 2*(1). Retrieved July 2004, from www.arc.org/C_Lines/CIArchive/story2_1_07.html
- Sherman, L. W., & Berk, R. A. (1984a). The Minneapolis Domestic Violence Experiment. *Police Foundation Reports, 1*, 1-8.
- Sherman, L. W., & Berk, R. A. (1984b). The specific deterrent effects of arrest for domestic violence. *American Sociological Review, 49*, 261-272.
- Stark, E., & Flitcraft, A. (1988). Violence among intimates: An epidemiological review. In V. V. Van Hassett, R. L. Morrison, A. S. Bellack, & M. Hersen (Eds.), *Handbook of family violence* (pp. 293-317). New York: Plenum.
- Straus, M. A. (1999). The controversy over domestic violence by women: A methodological, theoretical, and sociology of science analysis. In X. B. Arriaga & S. Oskamp (Eds.), *Violence in intimate relationships* (pp. 17-44). Thousand Oaks, CA: Sage.
- Straus, M. A., Gelles, R. J., & Steinmetz, S. (1980). *Behind closed doors: Violence in the American family*. Newbury Park, CA: Sage.
- Straus, M. A., Hamby, S. L., Boney-McCoy, S., & Sugarman, D. B. (1996). The revised Conflict Tactic Scale (CTS2): Development and preliminary psychometric data. *Journal of Family Issues, 17*, 283-316.

- Strauss, A. L. (1987). *Qualitative analysis for social scientists*. New York: Cambridge University Press.
- Thurman v. City of Torrington, CT. 595 F Supp. 1521 (D. Conn. 1984).
- Tjaden, P., & Thoennes, N. (2000). *Extent, nature and consequences of intimate partner violence: Findings from the National Violence Against Women Survey*. Washington, DC: National Institute of Justice and the Centers for Disease Control and Prevention.
- Vivian, D., & Langhinrichsen-Rohling, J. (1996). Are bi-directionally violent couples mutually victimized? A gender-sensitive comparison. *Violence and Victims, 9*, 107-124.
- Wilson, K., Vercella, R., Brems, C., Benning, D., & Refro, D. (1992). Levels of learned helplessness in abused women. *Women and Therapy, 13*, 53-67.
- Worcester, N. (2002). Women's use of force: Complexities and challenges of taking the issue seriously. *Violence Against Women, 8*, 1390-1415.
- Wright, E. A. (2000). Not a Black and White issue: For battered and abused Latinas and Black women dialing 911 may be risky business. In N. Worcester & M. H. Whatley (Eds.), *Women's health: Readings on social, economic, and political issues* (pp. 549-552). Dubuque, IA: Kendall/Hunt.
- Zorza, J., & Woods, L. (1994). *Mandatory arrest: Problems and possibilities*. New York: National Center on Women and Family Law.

Susan L. Miller is a professor in the Department of Sociology and Criminal Justice at the University of Delaware. She has published extensively on gender, crime, and social control and/or policy issues. She is the author of *Gender and Community Policing: Walking the Talk*, and the edited book, *Crime Control and Women: Feminist Implications of Criminal Justice Policy*, which examines the gender/race/crime nexus and related policy implications. Her current research interests include feminist debates in victimology and policy issues related to women who are battered and arrested on domestic violence charges.

Michelle L. Meloy is an assistant professor in the Department of Sociology, Anthropology, and Criminal Justice at Rutgers University. Her primary areas of interest are gender and crime, violence against women, and victim-related issues. Much of her work has focused on sex offenders and intimate partner violence. She is currently coauthoring (with S. L. Miller) a book on victimology and has a forthcoming book on male sex offenders.