

Understanding and Addressing Women's Use of Force in Intimate Relationships: A Retrospective

Violence Against Women

2019, Vol. 25(1) 56–80

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DOI: 10.1177/1077801218815776

journals.sagepub.com/home/vaw

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Abstract

This article surveys an evolving understanding of women's use of force in their intimate heterosexual relationships. It explores the common characteristics of women who use force and, using an intersectional lens, considers the experiences of women in marginalized communities. It also examines how the legal response to intimate partner violence has affected this population. In addition, the development of and best practices in community-based gender-responsive programming for women's use of force in their intimate heterosexual relationships are overviewed. In conclusion, this work identifies challenges that still exist in effectively responding to women's use of force.

Keywords

intimate partner violence, women's use of force, intersectionality

Introduction

Although the early battered women's movement was primarily focused on men's use of violence against their partners, it also recognized the need to seek justice for women who fought back against their rapists and abusers. During the 1970s, feminist activism on behalf of women like Joan Little, Inez Garcia, and Yvonne Wanrow called attention

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to the plight of women who fought back against their abusers and the legal system's rejection of their claims of self-defense. As early as 1978, the Women's Self-Defense Law Project was formed by a coalition of social scientists, trial consultants, legal workers, and attorneys to help attorneys provide effective representation to women forced to defend themselves against violent attacks (Bochnak, 1981). Around the same time, advocates in some cities began receiving calls from women who had been incarcerated for using force and needed help. In 1984, such calls led Women Against Abuse in Philadelphia to start a program to provide advocacy for victims of battering charged with homicide or assault against their abusive partners; the National Clearinghouse for the Defense of Battered Women, also located in Philadelphia, opened in 1987. These activists recognized that attorneys and jurors often saw women's use of violence as unnatural and did not understand why women would need to use violence to protect themselves or their children. Despite public education and media campaigns designed to provide the legal and political establishments and the public at large with this information, 40 years later, lawyers, judges, jurors, and the general public still lack a complete understanding of women's use of force against current/former partners.

This article surveys the evolving United States (U.S.)-based understanding of women's use of force in intimate relationships. The article looks at the common characteristics of women who use force and, applying an intersectional lens, considers the use of force by women in marginalized communities. It examines how the legal response to intimate partner violence (IPV) affected women who used force and how that response evolved to address women's use of force. It explores the development of and best practices in gender-responsive programming to respond to women's use of force in their intimate heterosexual relationships. The article concludes by identifying the challenges that still exist in responding to women's use of force.

Understanding Women's Use of Force

There has been extensive research in the past two decades on women's use of force in heterosexual relationships. That research indicates that (a) most women who use force against their male intimate partners are themselves battered (e.g., Bair-Merritt et al., 2010; Dasgupta, 1999; Fanslow, Gulliver, Dixon, & Ayallo, 2015; Gondolf, 2012; Miller, 2005; Swan, Gambone, Caldwell, Sullivan, & Snow, 2008; Swan, Gambone, & Fields, 2005); (b) there are multiple motivations for using such violence, including self-defense, escaping abuse, and reclaiming a sense of self (e.g., Bair-Merritt et al., 2010; Barnett, Lee, & Thelen, 1997; Dasgupta, 1999, 2002; Larance & Miller, 2017; McMahon & Pence, 2003; Miller, 2001; Miller & Meloy, 2006; Pence & Dasgupta, 2006; Swan et al., 2005); and (c) women who use force often suffer punishing consequences for their conduct meted out by their partners and various systems in society (e.g., Bachman & Carmody, 1994; Barnett et al., 1997; Dasgupta, 1999; Morse, 1995; Swan, Gambone, Lee Van Horn, Snow, & Sullivan, 2012; Thureau, Le Blanc-Louvry, Thureau, Gricourt, & Proust, 2015).

Researchers have also advanced typologies of IPV that explore women's use of force in context. For instance, Michael Johnson's (1995, 2000) work addresses the

degree of control that motivates use of violence in intimate relationships. He differentiates between *common couple violence*, in which both partners use violence unconnected to control; *intimate terrorism*, in which men are more likely to use violence as one tactic in a general pattern of control; and *violent resistance*, primarily used by women and unmotivated by control (Johnson, 1995, 2000).

Understanding Women's Use of Force in Cultural Context

Most women who use force in intimate relationships are themselves victimized by their male partners. But the idea of a woman fighting back against her abusive partner is at odds with prevailing stereotypes applied to women subjected to abuse. Historically, the literature on IPV characterized women subjected to abuse as weak, passive, powerless, compliant, dependent, and submissive to authority. Women subjected to abuse were seen as descendants of the Victorian “respectable woman,” deserving of protection, as opposed to the “rough woman,” who did not merit similar concern (Stark, 1992, p. 277). This “paradigmatic victim” would never fight back against a partner (Goodmark, 2012, p. 63). As a result, women who use force are often viewed skeptically when they claim to have used force in response to the violence of their partners.

The paradigmatic victim is also cast as White. Victimization has long been tied to White womanhood. As law professor Shelby Moore explains, the respectable or “true woman” pious, pure, submissive, and domestic—is a status only attainable by White women; “African American women, whose stereotype was created by slavery, have been and continue to be denied ‘true woman’ status as defined by American culture” (Moore, 1995, p. 324). And the greater likelihood that Black women will use force against their partners helps to perpetuate the belief that Black women are not “true” victims of IPV, particularly when they have used force. The paradigmatic victim is also heterosexual, in keeping with early conceptions of IPV as “wife abuse,” committed by husbands against their female spouses.

Reconceptualizing the “paradigmatic victim” requires us to look at women who use force through an intersectional lens. Intersectionality “references the critical insight that race, class, gender, sexuality, ethnicity, nation, ability, and age operate not as unitary, mutually exclusive entities, but as reciprocally constructing phenomena that in turn shape complex social inequalities” (Collins, 2015, p. 2). Intersectionality, as a theory and analytic tool, pushes back against tendencies to essentialize one category of identity—woman, for example—by focusing on how identities overlap and interlock to produce privilege and oppression (Samuels & Ross-Sheriff, 2008). Over time, the collective voices and anti-oppression work of women of color have shaped the contemporary understanding of intersectionality (Crenshaw, 1991), and the virtual “invisibility” of women of color in policy, practice, and research agendas has been made visible (Carastathis, 2016, p. 118).

Historically, the U.S.-based battered women’s movement often failed to center the voices of women of color in messaging about and responses to IPV (Kanuha, 1996; Richie, 2002; Schechter, 1982). This failure created problems in effectively addressing IPV, particularly in cases where women of color were both IPV

survivors and perpetrators (Gardner, 2007). This “racial blindness” (Bilge, 2012) is clear, for example, in the advocacy to make the criminal legal system (CLS) the primary response to IPV in the U.S., advocacy which largely ignored the concerns of women of color about the disproportionate impact of such policies on their partners, their communities, and themselves (Bilge, 2012; Miller, 1989; Potter, 2008; Richie, 2002).

The early battered women’s movement failed to incorporate the insights of women of color about how race informed and complicated IPV. Without “seeing” race as well as gender, the movement could not understand the complex experiences of battered women of color. Crenshaw (2012), for example, powerfully points out that because White women and Black men have left Black women out of their social justice agendas, Black women have become more vulnerable to being portrayed as having individual pathologies and cultural deficits, making their surveillance and punishment seem appropriate.

Anti-violence advocates frequently argued that IPV could happen to anyone. And while that is true, IPV, and the use of force, is experienced differently by women of color and women from other marginalized communities, including immigrant communities. Those experiences are considered below.

Experiences of Black battered women who use force. Black women are disproportionately affected by IPV. According to the National Violence Against Women Survey, Black women experience higher rates of intimate partner homicide than their White counterparts (Lee, Thompson, & Mechanic, 2002). The Bureau of Justice Statistics (BJS, 2001) found that Black women experience IPV at a rate 35% higher than that of White women and about 2.5 times the rate of women of other races. Black women are less likely to report abuse to authorities or seek help due to discrimination, distrust of police, and negative stereotyping (Nash, 2005). Black women are also less inclined than White women to use social services and battered women’s programs, report abuse to authorities, or go to the hospital because of abuse (Feminist Majority Foundation’s Choices Campus Campaign, 2006). Because of this reluctance, Black women have even fewer options for responding to IPV.

Black women’s experiences with IPV are complicated by stereotypes caricaturing Black women as angry, strong, and masculine and by the likelihood that they will use force against their partners. Early studies demonstrated that Black women fought back against their abusive partners at greater rates than White women (Hampton, Gelles, & Harrop, 1989; Joseph, 1987; Stets, 1990; West & Rose, 2000, as cited in Potter, 2008, p. 116). This finding is bolstered by National Crime Victim Survey data that showed IPV against Black men was approximately 62% higher than against White men (Rennison & Welchans, 2000).¹

Hillary Potter’s (2008) work characterizes Black women’s use of force in relationships as strategic responses (see Dutton, Goodman, & Bennett, 1999). Potter views Black women who use force as dynamic resisters. Her interviews with 40 battered Black women reveal the complexity of how relationship violence is understood. Some women feel that fighting back might cause the abuser to cease violence (although

studies suggest that there may instead be a greater risk of more intensified violence and injury; see Bachman & Carmody, 1994). Being able to express anger can make women feel empowered without feeling like criminals or victims. This finding echoes work by Ferraro and Johnson (1983) who found that “when battered women express their anger over their abuse, they frequently feel as though they have done something constructive in combating the abuse and delight in this expression of defense” (described in Potter, 2008, p. 121). The women in Potter’s study did not view themselves as unfeminine when they fought back, but rather as protectors of their children, who were exercising their right of self-defense and their right to not be abused. She argues that because Black women are raised with the stereotype of being stronger, angrier, and more masculine than White women, they are freer to “resist their batterers without the guilt of feeling less than a woman for doing so . . . [and able to] express angry feelings and communicate their anger in a physically resistant manner with less difficulty than other women” (p. 136). The women described how their own mothers taught them to be strong women. They viewed physical resistance as part and parcel of protecting themselves. Finally, Potter contextualizes this dynamic resistance historically. Black women fight back against their abusers because of their knowledge that “they, and all the Black women before them, have labored and persisted through an expansive assortment of struggles, starting with slavery and through present times” which helps women “to view their abuse by an intimate as another form of domination that they must fight off on a regular basis” (pp. 136-137).

Interacting with law enforcement is particularly problematic for Black women who use force. Given concerns about exposing Black men to a CLS that disproportionately targets Black people, Black women may be less likely to contact law enforcement for assistance. Calls to law enforcement from residents of Black communities also decrease as a result of high-profile incidents of police violence, like the deaths of Freddie Gray, Sandra Bland, and Michael Brown. Police are more likely to arrest Black women when they fight back and are more likely to arrest Black women on felony IPV charges (Bourg & Stock, 1994). While some women may have viable alternatives to the use of force, those options are considerably narrower for Black women subjected to abuse.

South Asian immigrant battered women who use force. Immigrant women subjected to abuse have similar hesitations about calling the police, especially in the current political climate. Media depictions of battered immigrant women who are arrested and deported after seeking protection from the police or courts have had a chilling effect on reporting of IPV by immigrant women across the U. S. This narrowing of options may also increase the likelihood that immigrant women will use force against their partners. Law enforcement may be more likely to arrest the victims of battering if they do not have knowledge of cultural contexts and the kinds of barriers that may put battered immigrant women and women of color in a position where they resist the abuse with force. A case in point is South Asian immigrant battered women who have used force in heterosexual relationships.

In South Asian cultures, women are under enormous family and cultural pressures to keep their marriages intact, even when their husbands are abusive. Furthermore, the colonial past of the region has taught the community to view the law enforcement and legal systems as arbitrary at best and oppressive at worst and to fear and avoid both. For women, this dread is more pronounced, due to their physical vulnerability and cultural prohibitions. In addition, there are strict cultural restrictions about “insiders” and “outsiders” in South Asian communities. Insiders include one’s close relatives and family, whereas outsiders are all others, including therapists, advocates, and the police. According to the cultural code, personal information of a “shameful” nature (e.g., battering, sexual assault, disharmony in marriage, information related to sex, mental health) can be shared, if at all, only with insiders, preferably of the same gender. Seeking help from “outsiders,” particularly asking law enforcement into one’s home, is shameful, especially if the caller is a wife who is complaining against her husband (Dasgupta, 2007; Dasgupta & Warriar, 1995). Generally, South Asian communities tend to believe that no good can come of engaging with the police and the legal system in family matters. Thus, South Asians, especially women, have little faith in the legal and law enforcement systems to seek assistance when battering occurs (Ahmed-Ghosh, 2004; Dasgupta, 2011; Panchanadeswaran & Koverola, 2005; Prasad, 1999). The pressures to preserve marriage and the skepticism regarding institutional interventions place immigrant South Asian women in an untenable situation when they are experiencing IPV. As they believe there are no familial supports or acceptable recourses available to end/escape abuse, the use of force against a partner may be their only viable choice.

Police responders often ignore South Asian women who lack fluency in English. When they respond to a “domestic incident,” officers often gather information from the abuser because they cannot communicate with the woman. These issues also exist for other victims for whom English is not their first language. Abusers typically use these opportunities to their advantage, omitting their own violence from the narratives that they give to police or telling stories that highlight their partner’s violence and minimize their own (Sokoloff & Dupont, 2005).

While South Asian women are constrained by their cultural socialization from seeking assistance from legal institutions and speaking to outsiders, men are unencumbered by such sentiments and deliberately manipulate systems to consolidate control over their victims. Women report that their husbands inflict injuries on themselves (usually cutaneous scratches), lie to the police, and threaten to besmirch the women’s reputation in the community to punish them and extract obedience in the future.

As South Asian women who use force are processed through the CLS, they are repeatedly asked, “Why did you not call the police?” While large numbers of “American” battered women are reluctant to call the police, the failure to seek police assistance is seen as particularly aberrant when South Asian immigrant women are involved. But many South Asian battered women fear calling the police lest their husbands withdraw their immigration sponsorship. Immigration restrictions, especially in recent years, have slowed reporting by South Asian battered women. Women are afraid of calling the police to avoid attracting the attention of U.S. Immigration and

Customs Enforcement. Ironically, however, their resistive use of force renders them vulnerable to various immigration sanctions. If arrested, they also become ineligible for immigration relief through the Violence Against Women Act (VAWA), a remedy that can help battered immigrant women obtain permanent residency. And once a South Asian mother is charged with domestic violence, her abusive husband frequently manipulates child protective services to deprive her of custody of her children.

Ultimately, institutions that are gender and context blind wreak significant harm on South Asian and all immigrant women of color who have resorted to violence to cope with intimate battering. Unless policies are grounded in real-life contexts of victims of various cultures and communities, historical understanding of violence against women, and intersectional analyses of women's oppression, battered women's use of force against intimate partners is not likely to receive consistent justice.

The Legal Response to Women's Use of Force

The early anti-violence movement was committed to ensuring that IPV was treated as a crime like any other and advocated for interventionist law enforcement policies and practices designed to increase arrest, conviction, and punishment of those who used force. What the anti-violence movement may not have appreciated was how those policies might come to harm women, particularly women who used force. It quickly became apparent, however, that in the contexts of both fatal and nonfatal force, the stepped-up law enforcement response would have problematic consequences for women. These situations were complicated by the dual status of victim and perpetrator of violence of many of the women who became (and continue to become) enmeshed in the CLS.

Mandatory Arrest

The anti-violence movement's attempts to transform the legal response to IPV began with police. The anti-violence movement charged that police were reluctant to intervene in what they saw as private family matters. Anti-violence advocates argued that police should make arrests whenever they had probable cause to do so, rather than suggesting that offenders take a walk around the block to cool down, as police training manuals of the 1960s and 1970s advised. Their argument was bolstered by research suggesting that arrest deterred further violence. The Minneapolis Domestic Violence Experiment found that arrest was associated with decreased recidivism rates in Minneapolis, Minnesota (Sherman & Berk, 1984). Researcher Lawrence Sherman warned, however, that the results would need to be replicated before conclusions about the impact of arrest could be drawn (Sherman, Smith, Schmidt, & Rogan, 1992). Notwithstanding that warning, jurisdictions across the United States adopted mandatory arrest policies. Mandatory arrest laws were bolstered in 1994 by the original iteration of the VAWA, which required states receiving grant funding under the Act to have adopted mandatory arrest policies. Although the 2000 incarnation of VAWA softened

the requirement, allowing grantees to have either mandatory or preferred arrest policies, many jurisdictions had already put mandatory arrest policies in place.

Sherman's warning about the need to replicate early arrest studies was prescient. Later research found that arrest deterred recidivism in some jurisdictions, had no impact in others, and contributed to violence in some places (Berk, Campbell, Klap, & Western, 1992; Dunford, 1990; Dunford & Elliott, 1990; Garner, Maxwell, & Fagan, 1995; Pate & Hamilton, 1992). Mandatory arrest has also had unintended consequences for women. Arrests rates for women rose significantly after jurisdictions adopted mandatory and pro-arrest policies, a result some have deemed "gendered injustice" (Renzetti, 1999, p. 49). Research has found that these increases are a function of the laws themselves and not attributable to women's increased violence (Durfee, 2012). The number of dual arrests also rose in jurisdictions with mandatory arrest policies (Hirschel, Buzawa, Pattavina, & Faggiani, 2007; Martin, 1997).

All women are vulnerable to domestic violence charges, either because they actually use force for whatever reason or because their abusers make false accusations against them to manipulate the legal process (Osthoff, 2002; Roy, 2012). But women from marginalized communities, including low-income women, immigrant women, women of color, lesbians, and women with disabilities (Ballan & Freyer, 2012; Potter, 2008; Richie, 1996, 2012; Sokoloff & Dupont, 2005; Swan & Snow, 2003; West, 2002, 2007), are particularly at risk of being arrested and charged with domestic violence. A significant reason for such arrests is law enforcement's concern with gender neutrality in policing IPV and the lack of sensitivity to the cultural contexts and individual barriers that move many women to resist abuse with force.

The increases in women's arrest rates gave further fuel to some men's and father's rights groups, who claimed that women frequently initiated violence and were more prone to carry it out than men (Dragiewicz, 2008, 2012; Meizies, 2007). Family violence researchers perpetuated the myth that women are just as violent as men by using the Conflict Tactics Scale (Straus, 1993) acontextually, without exploring the gendered power dynamics, motivations, and consequences of use of force (Archer, 2000; Cook, 1997; Fiebert, 1997). Gender-symmetry claims focus on a narrow and decontextualized definition of minor acts reported in the CTS; once the methodology, dynamics, and outcomes are taken into account, scholars find context matters immensely to elucidate motivations and outcomes, and that women are most likely to be the victims of male violence and most likely to use violence themselves defensively (Dragiewicz, 2008; Miller, 2005).

The Evolution of Battered Woman Syndrome

Until the 1980s, the law did not contain provisions specifically intended to address the use of force by women subjected to abuse. Most often, when women used violence against or killed their partners, they claimed that those actions had been in self-defense. Women like Judy Norman, who killed her husband J.T. after enduring 2 days of continuous beatings and threats, attempted to justify their actions by showing that their use of force was necessary to prevent imminent death or serious bodily

harm. But women subjected to abuse faced a number of barriers in arguing self-defense. First, self-defense law was shaped by the assumption that self-defense claims would involve similarly situated men (Gillespie, 1989). The law failed to contemplate the size and strength differentials between many men and women, which sometimes caused women to use what appeared to be disproportionate force or to use weapons to protect themselves. Second, the law failed to recognize that a woman's belief as to the imminence of death or serious injury might be affected by the context of abuse. This issue arose often in cases where women used force while their husbands were sleeping or during an interlude in their husbands' violence. Self-defense also requires that the belief that death or serious harm is imminent must be reasonable. Seeing a woman's use of force as reasonable was problematic on a number of fronts, ranging from stereotypes of women's passivity to norms around men's use of violence against their partners to assumptions about how the "reasonable person" (usually understood as the "reasonable man") would have perceived the danger. Finally, self-defense in many jurisdictions required the person using force to retreat from the dangerous situation if possible, even if the violence was occurring in one's own home. The so-called castle doctrine (from which the idea of a man's home being his castle derives) generally allows for the use of force to protect oneself in one's home. But in some jurisdictions, the castle doctrine did not apply in spaces where both parties had an equal legal right to be, imposing a duty to retreat prior to using violence in those jurisdictions. These barriers often meant that women were not permitted to raise the issue of self-defense or were convicted despite providing evidence of self-defense. In a survey of women subjected to abuse who killed their partners, law professor Charles Ewing found that most of the women had been convicted because they could not establish self-defense under the law (Ewing, 1990).

The legal landscape changed significantly in 1984, with the publication of Lenore Walker's *The Battered Woman Syndrome*. Walker was the first to develop a comprehensive theory designed to explain why some women subjected to abuse killed their partners. She called that theory battered woman syndrome. In the earliest iterations of the theory, Walker married two concepts that she had first introduced in her 1979 book, *The Battered Woman*: learned helplessness and the cycle of violence. Walker originally used the cycle of violence and learned helplessness to explain why women could not leave their abusive partners, even as they perceived the danger increasing, until the point where they had no choice but to use deadly force to protect themselves. Later iterations of the syndrome consisted of seven factors, four from the clinical diagnosis of posttraumatic stress disorder (PTSD; reexperiencing trauma, high levels of arousal and anxiety, high levels of avoidance, and cognitive difficulties) and three from Walker's research (disruption in interpersonal relationships, health and body image problems, and sexual and intimacy issues) (Walker, 2017). Walker and others note that battered woman syndrome as used by the psychological community is quite distinct from the manner in which the legal system has chosen to use the term. Walker explains,

Psychologists use the term "BWS" . . . to talk about the psychological impact from living with domestic violence. The legal system adds to that definition a description of the

dynamics of the violence, often emphasizing physical assaults and downplaying the role of psychological maltreatment and coercive control. . . . The courts combine the entire research project under that title [BWS] so that the cycle theory and learned helplessness are under the dynamics of battering relationships along with the psychological symptoms that are often seen as a result of the abuse. (Walker, 2017, p. 529)

As Walker recognizes, significant opposition to battered woman syndrome quickly emerged. Those critiques took a number of forms. David Faigman (1986) argued that Walker's own research failed to support her theories. Others noted the internal inconsistency in the theory: learned helplessness, a theory based on the idea that women are conditioned not to act in response to violence, is used to explain the extremely active step of killing one's abuser. Battered woman syndrome is also at odds with research demonstrating that women actively seek help and fight back against their abusers (Gondolf & Fisher, 1988), research Walker acknowledged in later editions of *The Battered Woman Syndrome*. Describing women's experiences as a "syndrome" has been seen as pathologizing women (Jacobsen, Mizga, & D'Orio, 2007). Finally, critics charge that battered woman syndrome fails to capture the experiences of all women subjected to abuse, inadvertently entrenching problematic stereotypes of women subjected to abuse. Battered woman syndrome may be persuasive when "the defendant [is] a classic battered woman" (Angiolillo, 2003, p. 256), but is less useful for nonconforming defendants—women who are angry, women who fight back against their abusers, women of color, lesbians, and women who misuse substances (Becker, 2001; Goodmark, 2008).

In 1996, the National Institute of Justice (NIJ) and the National Institute of Mental Health (NIMH) released a report recommending that the use of the term "battered woman syndrome" be discontinued because it failed to adequately convey the breadth of knowledge available regarding the effects of battering. The report recognized that no one model captured the array of women's experiences with IPV and cautioned that the use of the term "syndrome" could create the false perception that women subjected to abuse were suffering from some sort of mental health deficit (U.S. Department of Justice & U.S. Department of Health and Human Services, 1996). Many experts are more comfortable talking about "battering and its effects" than "battered woman syndrome." Nonetheless, many of the state statutes that allow for the consideration of IPV in criminal proceedings continue to use the language of battered woman (or battered spouse) syndrome, and judges frequently use the term in case law.

In a few state statutes, evidence of IPV or battered woman syndrome is specifically admissible only in the context of an insanity defense to explain why the defendant failed to appreciate the wrongfulness of her actions (although that evidence is certainly admissible to the extent that a judge finds it otherwise relevant). In the majority of cases, however, such evidence is used to bolster a claim of self-defense, particularly to demonstrate the reasonableness of the defendant's belief that death or serious bodily harm was imminent. Prosecutors have also used evidence of IPV to explain why a woman subjected to abuse might recant testimony or reconcile with her abuser. The law specifically requires evidence of IPV to be considered as a

mitigating factor in sentencing in some states, although, again, such evidence is likely admitted in other jurisdictions as well when relevant to understanding the context of the crime. Evidence of battering is also singled out for consideration in post-conviction parole hearings in some states.

The impact of the admission of testimony regarding battering and its effects is unclear, and studies considering this question are dated. The 1996 NIJ/NIMH report found that although courts were regularly admitting testimony regarding battered woman syndrome or battering and its effects, defendants who offered the evidence were not being acquitted as a result, and few convictions or sentences were overturned on appeal. Several older studies found that women who kill their partners are convicted at higher rates and sentenced to longer terms than men (Jacobsen et al., 2007; Leonard, 2002; Sack, 2009).

Using evidence of battering and its effects during the parole process is problematic as well. Offering evidence of abuse could help parole officials understand that a split-second reaction in the context of ongoing abuse or a choice made while experiencing fear, trauma, or PTSD does not predict future criminality. But there are a number of practical barriers to raising abuse in the context of parole hearings. Such hearings are often quite short and may not permit expert testimony (and may not even allow the offender to be represented). Parole commissioners often lack training on IPV, and there is little law governing the process. The single most important factor in a parole hearing is remorse; parole officials want to hear that the offender truly regrets the crime. Introducing evidence of battering in that context can make the offender look as though she is trying to justify or excuse her behavior rather than explaining how the crime came about. The woman who uses force in self-defense faces a Catch-22 in a parole hearing—that is, raising claims of abuse makes it look as though she is disclaiming responsibility and attempting to relitigate the underlying offense, but the circumstances surrounding the crime are often a key consideration for parole officials. In *Rossakis v. New York State Board of Parole*, for example, Niki Rossakis appealed New York's denial of her application for parole. Rossakis shot her husband after two decades of physical and sexual abuse. The parole board denied Rossakis's application for parole based on the nature of the crime, without considering Rossakis's achievements while incarcerated (which included obtaining two associate degrees, completing every program offered by the state, tutoring other inmates, and working for the Department of Motor Vehicles) or her remorse. Rossakis testified that,

I did the worst thing someone could do, and I killed . . . Gary and I'm very, very sorry for that. . . . When I first started my bid, I saw myself as the victim. Today I know that Gary is the victim. I no longer harp on the abuse just to justify what I did to my husband; I was wrong. I should have just gotten up and left. I should have made more of an attempt to reach out and talk to people. I didn't do that.

Nevertheless, the parole board found that Rossakis "continued to blame decedent for his death and continued to identify as an abuse victim despite the jury's guilty verdict." The New York Supreme Court found that the parole board acted irrationally in denying

Rossakis parole, but few states have a procedure that allows for judicial review of parole board decisions.

Evidence of battering and its effects has been employed much more productively in the context of clemency. A number of clemencies were granted after the initial introduction of battered woman syndrome in the late 1980s. In Ohio, for example, 28 women who had killed their partners were released after Governor Richard Celeste granted them clemency in 1991. Other governors followed suit, and as of 2002, in 23 states at least 124 women who killed their partners had been granted clemency (Burke, 2002). In 2001, California created an additional avenue for relief for women who killed their partners using habeas corpus law. The provision allows women convicted of murder prior to California's adoption in 1996 of a statute allowing evidence of battering and its effects to seek relief based on the failure to introduce evidence of battering during the trial, if there is a reasonable probability that the result of the trial would have been different if such evidence had been admitted. As of 2011, at least 19 women had been released from prison as a result of actions brought under the statute.

Stand Your Ground Laws

Stand your ground laws could also provide protection for women who use force against their partners. Stand your ground laws authorize the use of deadly force if a person reasonably believes such force is necessary to preempt death or serious bodily injury. The majority of states have applied stand your ground laws in the cases of women who use violence against their partners in their homes. But in at least one state, prosecutors have argued that invoking stand your ground provisions in cases involving IPV is inconsistent with the law's intent. And some have questioned the differential treatment of women of color under such laws. In Florida, for example, Marissa Alexander, a Black woman, was convicted of aggravated assault after firing a single gunshot into the ceiling of her home to scare off her abusive ex-husband. Alexander attempted to invoke Florida's stand your ground law, but her request was denied by the trial court. An appellate court found that the trial court had acted appropriately in denying Alexander's stand your ground claim, but reversed her conviction on other grounds (Franks, 2014).

Programming for Women Who Use Force

According to established coordinated community response (CCR) protocol in domestic assault cases, domestic assault arrests typically result in an offender being court-ordered to participate in a probation-monitored fee-for-service nonviolence intervention program. Battered women's advocates, activists, and practitioners² struggled with arrested women being sent to these programs, as the dominant intervention model for addressing IPV was Batterer Intervention Programming (BIP). After all, BIPs, such as Alternatives to Domestic Aggression (Holtrop et al., 2017), the Duluth Domestic Abuse Intervention Project (DAIP; Pence & Paymar, 1993), and Emerge (Edelson & Tolman, 1992), were developed in the 1970s and 1980s to

address heterosexual male violence used against their intimate female partners. BIP interventions were specifically designed to address the sociocultural underpinnings and institutionalized infrastructure of the coercive control that abusive men leverage against their female partners (Stark, 2007). Referring women to BIPs was considered ineffective and potentially revictimizing (Dasgupta, 2002; Larance & Miller, 2017; Miller, 2001; Miller, Gregory, & Iovanni, 2005). Given the complexity of these cases, alternatives to a one-size-fits-all BIP model were critically needed for women who were arrested.

Advocate-practitioners addressing this issue knew that an effective intervention response to battered women's use of force had to be grounded in a very real concern that simply creating such interventions could serve to further stigmatize women who were already at the intersections of racial, economic, and immigrant documentation status vulnerability. If such interventions were created, coercive control and the context of the violence used by each partner had to remain central to ongoing direct service conversations, interventions, and policies regarding domestic violence in general and women's use of force in particular (Goodmark, 2008; Osthoff, 2002; Pence & Dasgupta, 2006; Worcester, 2002). With this understanding, advocate-practitioners were in the difficult position of needing to address the emotional and legal challenges encountered by arrested women coping with the results of their circumstances, all while maintaining an awareness that providing them a formal program to do so could potentially cause women further harm. Gardner (2007) posits that practitioners in these settings may be "inadvertently legitimizing a miscarriage of justice" and, among other things, possibly alienating women who would eventually seek agency services on their own (p. 77). But as conversations about these concerns and how best to proceed waged among advocate-practitioners, women in communities across the United States were navigating domestic violence charges, often without local advocacy programs or defense attorneys. Pressured by probation to meet time-sensitive court requirements demanding expedient intervention programming entry and completion, many women found their only alternative was BIP participation. Intervention responses grounded in the strengths of survivor support, yet distinctly different from batterer intervention, were sorely needed (Larance, 2006).

Gender-Responsive Intervention Approaches: Selected Experiences

Viable alternatives to BIP participation for women now exist in some communities, due to feminist advocate-practitioners who spearheaded gender-responsive, grassroots community-based services across the United States (Bloom, Owen, & Covington, 2004). Whether housed in victim services support agencies or provided by BIP affiliates, such services strive to meet the women's complex advocacy and intervention needs and facilitate their compliance with court orders. They do so while remaining in critical conversation with community partners—law enforcement officers, judicial personnel, and probation officers—regarding the gendered nature of IPV as well as consequences rooted in justice. But even when services are tailored to the needs of the women they serve,

there is always at least one victim [in group] who discusses the difficulty in simply showing up, ranging from problems with the bus schedules to securing safe and adequate childcare . . . there is always at least one victim who discusses her frustration that her abusive partner is not being held accountable for his violent behavior. (Gardner, 2007, p. 90)

Thus, the challenges of meeting the women's complex needs persist. The intervention responses that evolved out of community-based programs detailed here demonstrate how grassroots advocate-practitioners continue to navigate these challenges while providing women with critical institutional support. The programs and their curricula share the goal of providing gender-responsive advocacy, support, and intervention while reducing and eradicating IPV, yet their avenues and methods vary. The programs' experiences are indicative of what many advocate-practitioners across the nation, and around the world, continue to confront.

Duluth, Minnesota: Turning points. In 1981, the Duluth Model's CCR was put into place. One aspect of the model was to evaluate whether mandatory arrest had a positive impact on increasing the safety of women who had survived domestic violence. The model's creators knew that women who had survived domestic violence were potentially at risk of being arrested under this new policy; indeed, that risk had been there all along. But the creators also believed that a targeted CLS response to domestic violence—typically involving men's violence against women—was critical in increasing women's safety.

As the CCR evolved, women who had survived domestic violence were increasingly arrested for their own use of violence. The DAIP started groups for these women. Eventually, the community responded with a prosecution policy created by the City Attorney's office: The Crossroads Program (Asmus, 2007). The gender-neutral Crossroads Program, a diversion program, provided an avenue for cases of first-time offenders who were victims of ongoing physical abuse by their partners to be deferred out of the CLS so that they do not end up with a conviction. Participants in the Crossroads Program were assigned to DAIP support groups specially created for women who used force. Since the Program's inception in 1997, Crossroads Program participants receive direct service nonviolence intervention in DAIP support groups separate from women who are strictly victims of battering. Group facilitators realized the need for a curriculum for Crossroads Program participants, but struggled with the possible unintended consequences of creating a curriculum specifically for women court-ordered for their use of force. They feared that such a curriculum could be misused by service providers who did not understand the nuances of addressing women's use of force and, therefore, treating women just like the men who battered them.

To address this concern, Turning Points (Pence, Connelly, & Scaia, 2011), a three-part, curriculum-based program, was created. Turning Points evolved out of Ellen Pence's realization that advocate-practitioners across the country were using the Duluth Program curriculum—designed to serve men in BIPs—to serve women who used force (M. Scaia, personal communication, October 13, 2017). Turning Points'

creators believed that using a curriculum developed to address male battering tactics for women who had resorted to using violence was not only ineffective but also promoted the ill-informed notion that men's and women's violence were the same and, therefore, could be addressed in the same manner. Turning Points was designed with the goal of promoting women's understanding of the violence they use and experience and of ultimately ending both. The creators believed that video vignettes would be particularly helpful in the direct practice intervention settings. Therefore, the curriculum participant and facilitator manuals not only guide women through the journey of addressing their personal experiences with violence but also provide them with visual aids and vignettes to promote conversation and deeper understanding regarding women's experiences navigating violence. Turning Points is now utilized in programs across the United States and around the world.

Ann Arbor, Michigan: RENEW. In 1987, the community of Ann Arbor, MI, had adopted a mandatory arrest ordinance; a spike in arrest rates of women with domestic violence survivorship histories followed. The on-call response team at Domestic Violence Project/Safe House (now SafeHouse Center), tasked with providing immediate services following law enforcement's response to a domestic violence call, found that the "survivor", within an advocacy definition of domestic abuse, was not necessarily the person the police identified as the victim" (Larance & Rousson, 2016, p. 878). The advocacy and support agency responded by creating a guidebook for their survivor support staff (House, 2001). The guidebook provided an advocacy and assessment framework for frontline workers as well as community partners struggling with a range of complex intervention issues, including the validity of asking women who have used force if they are afraid of their partners; the problem of weighing visible injury at arrest; and differentiating between "suspect/defendant" and "victim" following an arrest, in contrast to the "batterer" and "survivor" in the couple's interpersonal relationship (Larance & Rousson, 2016, p. 878). The guidebook was disseminated throughout advocate and activist program networks across the United States, gradually providing a foundation for contextualized gender-responsive programming.

The guidebook met the short-term needs of advocate-practitioners and first responders in the community, but solutions to formal intervention were still evolving. Initially, women who had survived domestic violence and were arrested on domestic violence charges were encouraged to voluntarily seek confidential support services at SafeHouse Center. Community partners eventually found that women across the county, without formal access to services to address their use of force, were rearrested on domestic violence charges at a higher rate than men court-ordered to attend BIPs. It was believed that more formal services, which could be monitored by probation, were needed. Therefore, the court began ordering women to attend groups facilitated by individual counselors in the community. This referral process was maintained until formal nonviolence intervention for women was established in 2006 at Catholic Social Services of Washtenaw County's Women's-ADA Program. However, after less than a year, the non-contextual gender-neutral program, framed in BIP approaches to intervention, was

dismantled and replaced by the gender-responsive RENEW Program (Gondolf, 2015; Larance & Rousson, 2016). RENEW is a hybrid program that utilizes both the Vista and Meridians³ curricula (Larance, Cape, & Garvin, 2012). The number of women who have received RENEW services over the years has ballooned since its inception. Years with particularly high referral rates correspond with the hiring of new police recruits.⁴

Morris County, New Jersey: Vista. In the late 1990s and early 2000s, the Jersey Battered Women's Service, Inc. (JBWS)—a full-service domestic abuse prevention agency in Morris County, New Jersey—struggled with how to effectively intervene in the lives of battered women who had used force. During in-house survivor support groups, it was not unusual for women to disclose that they had used violence or were considering the use of violence to navigate their partner's abuse against them. Women in the community also contacted the agency for assistance addressing their feelings of shame and confusion for responding violently against their abusive partners after years of enduring violence. Anti-violence advocates in New Jersey were gravely concerned that programming created specifically for these women would have unintended negative consequences in the long term. When municipal and superior court judges in Morris County, New Jersey, began court-ordering women to participate in BIPs, JBWS agency leaders decided to formally provide services to women, but in a gender-informed manner.

Vista, which opened its doors in August 2002, was the result. Vista looked beyond a BIP framework and encouraged advocacy, education, intervention, and support (Larance, 2006; Larance, Hoffman-Ruzicka, & Shivas, 2009). Vista developed an in-house curriculum through participant–facilitator collaboration. Participants suggested session topics and, in turn, evaluated session topics the facilitators introduced to them. Through this multiyear interactive process, Vista evolved into a 20-session, gender-responsive, nonviolence program meeting the needs of women court-ordered to intervention for having used force. The intervention groups have a general focus of offering safety and support planning, exploring feelings of shame and/or guilt regarding their violence, investigating sociocultural messages that shape perceptions of viable alternatives, and promoting healthy, violence-free relationships. To increase awareness of promising practices for practitioners also serving this population in individual or group settings, the Vista Program Curriculum was published by the Jersey Center for Nonviolence and became available as a free download in 2009 (Dieten, Jones, & Rondon, 2014; Larance et al., 2009). Vista is utilized in a number of locations across the U. S. as well as Australia, China, the United Kingdom, and, 70 United States Air Force bases around the world.

W-Catch22. In tandem with community-based efforts to directly intervene in the lives of women arrested for using force, advocate-practitioners were also building a virtual community to promote resource sharing among professionals addressing the women's complex needs (Larance & Miller, 2017). To this end, W-Catch22 was founded in 2007. In 2016 and 2017, W-Catch22's international membership

representing 321 agencies was informally surveyed regarding whether or not they provide programming for women who have used force and, if so, what resources their programs use. Forty-one service providers responded to the survey, representing six countries (Australia, Canada, China, Malta, the United Kingdom, and the United States) and 21 states in the United States. The curricula used are Turning Points, Vista, or Beyond Violence.⁵ Their use ranges from exclusive use of a specific curriculum to integrating what works from all three. Others modified curricula developed for men who batter, while still others have created their own in-house unpublished curricula.

Moving Forward: Promising Practices in Responding to Women's Use of Force

Although there is still much to learn in providing support to women who have used force, much wisdom has also accumulated regarding assessment, group facilitation, and system responses. In general, assessment must be ongoing and refrain from focusing on whether or not women self-identify as being in fear of their partners (House, 2001; Larance, 2006, 2012; Larance & Miller, 2017). Instead, assessments must be behaviorally focused and encourage a deeper understanding of the full context of women's presenting relationships as well as past relationship experiences, with particular attention paid to issues of race, class, immigration, and the unique experiences of the person being assessed. Assessment and intervention providers must be keenly focused on understanding whether coercive control is an aspect of the presenting relationship or relationships in the past. This will not only inform trauma-responsive efforts but will potentially indicate the expansive nature of the abuse the women have navigated and/or continue to navigate.

Intervention groups should be co-facilitated by individuals who have an understanding of and appreciation for the complexity of the gendered nature of domestic violence, domestic violence survivorship, and domestic violence perpetration. It is critical that advocate-practitioners initiate safety and support planning during a woman's first contact for services and that this be ongoing and tailored to her specific, intersectional needs. Compassionate confrontation, if needed, can guide women toward violence-free futures. Group facilitators' encouraging connections between women during the group process can result in life-giving social networks that sustain them over the long term.

Systems responses are foundational to sustainable intervention. For example, expanding women's day-to-day access to extended community resources is pivotal to their long-term well-being. Women often need access to creative childcare options, reduced-fee legal services, local food pantries, job training and employment opportunities, sexual assault and domestic violence survivor counseling, and substance abuse and mental health treatment. Providing members of the CLS and judiciary with regular trainings pertaining to women's use of force and building interagency alliances of trust that encourage cooperation and information sharing for the long-term goal of eradicating IPV are also essential.

Conclusion

Women's use of force is complicated, culturally contextual, and contested. Over the past 40 years, our understanding of the ways in which women use force and the justifications for that use of force have evolved, and law, policy, and programming have responded. While significant strides have been made, however, much work is left to be done. Some jurisdictions have moved away from mandatory arrest policies, while others continue to arrest and incarcerate large numbers of women as a result of those policies. Women continue to be punished for force used in self-defense. A "Survived and Punished" movement has developed around some of these women, including Bresha Meadows, who shot her abusive father and spent almost 2 years in jail as a result. Although some police, prosecutors, and judges understand the need to probe the context within which women use force, others continue to rely on outmoded stereotypes and legal formulations. While programming exists for some women, others struggle to find gender-informed counseling. Our challenge is to continue to educate the CLS on women's use of force, to change laws and policies that disproportionately harm women of color and immigrant women who use force, to build gender-responsive and culturally responsive programming, and to support those who are looking beyond the CLS for responses to IPV—responses that will certainly benefit women who use force.

Acknowledgments

Our thanks to Mary Asmus, Stephanie Covington, Donna Gardner, Nancy Grigsby, Coral McDonnell, Sue Osthoff, Melissa Scaia, Aubrey Sitler, and the early inspiration of Anne Marshall for their perspectives and insight. However, this work reflects the ideas and perspectives of its authors. This work is informed by our experiences working with women who have used force, whose courage and honesty have enabled us to share their complex challenges.

Declaration of Conflicting Interests

The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

Funding

The author(s) received no financial support for the research, authorship, and/or publication of this article.

Notes

1. As Hillary Potter (2008) notes, most couples are intraracial; therefore, most of the Black men surveyed (who largely identify as heterosexual) would have been assaulted by Black women.
2. From this point forward, the term "advocate-practitioner" will be used to acknowledge direct service workers' multidimensional goals of ending domestic violence while simultaneously working in direct practice settings addressing individuals' experiences of intimate partner violence.

3. Meridians is a prison-based program for women who have experienced domestic violence. See <http://csswashtenaw.org/renew/meridians/>
4. RENEW participants receiving services—2007: 13; 2008: 48; 2009: 58; 2010: 71; 2011: 66; 2012: 67; 2013: 76; 2014: 66; 2015: 69; 2016: 49; and 2017: 38.
5. *Beyond Anger and Violence* is a manual-based intervention that focuses on anger and use of force (Covington, 2013).

References

- Ahmed-Ghosh, H. (2004). Chattels of society: Domestic violence in India. *Violence Against Women, 10*, 94-118.
- Angiolillo, D. D. (2003). Seeking truth, preserving rights—Battered women's syndrome/extreme emotional distress: Abuse excuse or syndrome defense. *Pace Law Review, 24*, 253-257.
- Archer, J. (2000). Sex differences in aggression between heterosexual partners: A meta-analytic review. *Psychological Bulletin, 126*, 651-680.
- Asmus, M. (2007). *At a crossroads: Developing Duluth's prosecution response to battered women who fight back*. Retrieved from <http://www.bwjp.org/resource-center/resource-results/at-a-crossroads-developing-duluth-s-prosecution-response-to-battered-women-who-fight-back.html>
- 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.
- Bair-Merritt, M. H., Crowne, S. S., Thompson, D. A., Sibinga, E., Trent, M., & Campbell, J. (2010). Why do women use intimate partner violence? A systematic review of women's motivations. *Trauma, Violence, & Abuse, 11*, 178-189.
- Ballan, M. S., & Freyer, M. B. (2012). Self-defense among women with disabilities: An unexplored domain in domestic violence cases. *Violence Against Women, 18*, 1083-1107.
- Barnett, O. W., Lee, C. Y., & Thelen, R. E. (1997). Gender differences in attributions of self-defense and control in interpartner aggression. *Violence Against Women, 3*, 462-481.
- Becker, M. (2001). The passions of battered women: Cognitive links between passion, empathy, and power. *William & Mary Journal of Women and the Law, 8*, 1-72.
- Berk, R. A., Campbell, A., Klap, R., & Western, B. (1992). A Bayesian analysis of the Colorado Springs spouse abuse experiment. *Journal of Criminal Law and Criminology, 83*, 170-200.
- Bilge, S. (2012). Developing intersectional solidarities: A plea for queer intersectionality. In M. Smith & F. Jaffer (Eds.), *Beyond the queer alphabet: Conversations on gender, sexuality, and intersectionality* (pp. 19-23). Ottawa, Ontario: Canadian Federation for the Humanities and Social Sciences.
- Bureau of Justice Statistics (2001). Violence Victimization and Race, 1993-98. Bureau of Justice Statistics Special Report. Retrieved from http://www.ncdsv.org/images/BJS_ViolentVictimizationAndRace1993-1998_3-2001.pdf
- Bloom, B., Owen, B., & Covington, S. (2004). Women offenders and the gendered effects of public policy. *Review of Policy Research, 21*, 31-48.
- Bochnak, E. (Ed.). (1981). *Women's self-defense cases: Theory and practice*. Charlottesville, VA: Michie.
- Bourg, S., & Stock, H. V. (1994). A review of domestic violence arrest statistics in a police department using a pro-arrest policy: Are pro-arrest policies enough? *Journal of Family Violence, 9*, 177-189.

- Burke, P. (2002, May). Gov. Davis commutes battered woman's sentence. *Women's eNews*. <https://womensenews.org/2002/05/gov-davis-commutes-battered-womans-sentence/>
- Carastathis, A. (2016). *Intersectionality: Origins, contestations, horizons*. Lincoln: University of Nebraska Press.
- Collins, P. H. (2015). Intersectionality's definitional dilemmas. *Annual Review of Sociology*, 41, 1-20.
- Cook, P. W. (1997). *Abused men: The hidden side of domestic violence*. Westport, CT: Praeger.
- Covington, S. S. (2013). *Beyond anger and violence: A prevention program for criminal justice involved women*. Hoboken, NJ: Wiley.
- Crenshaw, K. W. (1991). Mapping the margins: Intersectionality, identity politics, and violence against women of color. *Stanford Law Review*, 43, 1251-1299.
- Crenshaw, K. W. (2012). From private violence to mass incarceration: Thinking intersectionally about women, race, and social control. *UCLA Law Review*, 59, 1418-1472.
- Dasgupta, S. D. (1999). Just like men? A critical view of violence by women. In M. F. Shepard & E. L. Pence (Eds.), *Coordinating community responses 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.
- Dasgupta, S. D. (2007). Battered South Asian women in U.S. courts. In S. D. Dasgupta (Ed.), *Body evidence: Intimate violence against South Asian women in America* (pp. 211-226). New Brunswick, NJ: Rutgers University Press.
- Dasgupta, S. D., & Warriar, S. (1995). *In visible terms: Domestic violence in the Asian Indian context: A handbook for intervention*. Bloomfield, NJ: Manavi.
- Dasgupta, S. D. (with Kapoor, A.). (2011). *Intimate peril: Domestic violence against wives in West Bengal. A two-site study*. Kolkata, India: Swayam.
- Dieten, M. V., Jones, N. J., & Rondon, M. (2014). *Working with women who perpetrate violence: A practice guide*. Silver Spring, ND: National Resource Center on Justice Involved Women.
- Dragiewicz, M. (2008). Patriarchy reasserted: Fathers' rights and anti-VAWA activism. *Feminist Criminology*, 3, 121-144.
- Dragiewicz, M. (2012). *Equality with a vengeance: Men's rights groups, battered women, and antifeminist backlash*. Boston, MA: Northeastern University Press.
- Dunford, F. W. (1990). System-initiated warrants for suspects of misdemeanor domestic assault: A pilot study. *Justice Quarterly*, 7, 631-653.
- Dunford, F. W., & Elliott, D. S. (1990). The role of arrest in domestic assault: The Omaha police experiment. *Criminology*, 28, 183-206.
- Durfee, A. (2012). Situational ambiguity and gendered patterns of arrest for intimate partner violence. *Violence Against Women*, 18, 64-84.
- Dutton, M. A., Goodman, L. A., & Bennett, L. (1999). Court-involved battered women's responses to violence: The role of psychological, physical, and sexual abuse. *Violence & Victims*, 14, 89-104.
- Edelson, J., & Tolman, R. M. (1992). *Intervention for men who batter: An ecological approach*. Newbury Park, CA: Sage.
- Ewing, C. P. (1990). Psychological self-defense: A proposed justification for battered women who kill. *Law and Human Behavior*, 14, 579-594.
- Faigman, D. A. (1986). The battered woman syndrome and self-defense: A legal and empirical dissent. *Virginia Law Review*, 72, 619-647.
- Fanslow, J. L., Gulliver, P., Dixon, R., & Ayallo, I. (2015). Hitting back: Women's use of physical violence against violent male partners, in the context of a violent episode. *Journal of Interpersonal Violence*, 30, 2963-2979.

- Feminist Majority Foundation's Choices Campus Campaign. (2006). *Women of color and reproductive justice: African American women*. Retrieved from <http://www.feministcampus.org/fmla/printable+materials/WomenofColor/AfricanAmericanWomen.pdf>
- Ferraro, K. J., & Johnson, J. M. (1983). How women experience battering: The process of victimization. *Social Problems, 30*, 325-339.
- Fiebert, M. (1997). References examining assaults by women on their spouses or male partners: An annotated bibliography. *Sexuality & Culture, 1*, 273-286.
- Franks, M. A. (2014). Real men advance, real women retreat: Stand your ground, battered women's syndrome, and violence as male privilege. *University of Miami Law Review, 68*, 1099-1128.
- Gardner, D. (2007). Victim-defendants in mandated treatment: An ethical quandary. *Journal of Aggression, Maltreatment & Trauma, 15*, 75-93.
- Garner, J., Maxwell, C., & Fagan, J. (1995). Published findings from the spouse assault replication program: A critical review. *Journal of Quantitative Criminology, 11*, 3-28.
- Gillespie, C. K. (1989). *Justifiable homicide: Battered women, self-defense, and the law*. Columbus: Ohio State University Press.
- Gondolf, E. W. (2012). Physical tactics of female partners against male batterer program participants. *Violence Against Women, 18*, 1027-1044.
- Gondolf, E. W. (2015). *Gender-based perspectives on batterer programs: Program leaders on history, approach, research, and development*. Lanham, MD: Rowman & Littlefield.
- Gondolf, E. W., & Fisher, E. R. (1988). *Battered women as survivors: An alternative to treating learned helplessness*. Lanham, MD: Lexington Books.
- Goodmark, L. (2008). When is a battered woman not a battered woman? When she fights back. *Yale Journal of Law and Feminism, 20*, 75-129.
- Goodmark, L. (2012). *A troubled marriage: Domestic violence and the legal system*. New York: New York University Press.
- Hampton, R. L., Gelles, R. J., & Harrop, J. W. (1989). Is violence in Black families increasing? A comparison of 1975 and 1985 national survey rates. *Journal of Marriage and Family, 51*, 969-980.
- Hirschel, D., Buzawa, E., Pattavina, A., & Faggiani, D. (2007). Domestic violence and mandatory arrest laws: To what extent do they influence police arrest decisions? *Journal of Criminal Law & Criminology, 98*, 255-298.
- Holtrop, K., Scott, J. C., Parra-Cardona, J. R., Smith, S. M., Schmittel, E., & Larance, L. Y. (2017). Exploring factors that contribute to positive change in a diverse, group-based male batterer intervention program: Using qualitative data to inform implementation and adaptation efforts. *Journal of Interpersonal Violence, 32* (8), 1267-1290.
- House, E. (2001). *When women use force: An advocacy guide to understanding this issue and conducting an assessment with individuals who have used force to determine their eligibility for services from a domestic violence agency*. Ann Arbor, MI: Domestic Violence Project/SAFE House.
- Jacobsen, C., Mizga, K., & D'Orio, L. (2007). Battered women, homicide convictions, and sentencing: The case for clemency. *Hastings Women's Law Journal, 18*, 31-65.
- Johnson, M. P. (1995). Patriarchal terrorism and common couple violence: Two forms of violence against women. *Journal of Marriage and 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.
- Joseph, J. (1987). Woman battering: A comparative analysis of Black and White women. In G. K. Kantor & J. L. Jasinski (Eds.), *Out of darkness: Contemporary perspectives on family violence* (pp. 161-169). Thousand Oaks, CA: Sage.

- Kanuha, V. (1996). Domestic violence, racism, and the battered women's movement in the United States. In J. L. Edleson & Z. C. Eisikovits (Eds.), *Sage series on violence against women* (pp. 34-50). Thousand Oaks, CA: Sage.
- Larance, L. Y. (2006). Serving women who use force in their intimate heterosexual relationships: An extended view. *Violence Against Women, 12*, 622-640.
- Larance, L. Y. (2012). Commentary on Wilson, Woods, Emerson, and Donenberg: The necessity for practitioner vigilance in assessing the full context of an individual's life experiences. *Psychology of Violence, 2*, 208-210.
- Larance, L. Y., Cape, J. K., & Garvin, D. J. H. (2012, September). *Meridians for incarcerated women: Facilitator manual*. Ann Arbor, MI: Catholic Social Services of Washtenaw County. Retrieved from <http://csswashtenaw.org/renew/meridians/>
- Larance, L. Y., Hoffman-Ruzicka, A., & Shivas, J. B. (2009). *Vista: A program for women who use force*. Morristown, NJ: Jersey Center for Nonviolence.
- Larance, L. Y., & Miller, S. L. (2017). In her own words: Women describe their use of force resulting in court-ordered intervention. *Violence Against Women, 23*, 1536-1559. doi:10.1177/1077801216662340
- Larance, L. Y., & Rousson, A. (2016). Facilitating change: A process of renewal for women who have used force in their intimate heterosexual relationships. *Violence Against Women, 22*, 876-891. doi:10.1177/1077801215610890
- Lee, R. K., Thompson, V. L., & Mechanic, M. B. (2002). Intimate partner violence and women of color: A call for innovations. *American Journal of Public Health, 92* (4), 530-534.
- Leonard, E. D. (2002). *Convicted survivors: The imprisonment of battered women who kill*. Albany: State University of New York Press.
- 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.
- Mezies, R. (2007). Virtual backlash: Representations of men's "rights" and feminist "wrongs" in cyberspace. In S. B. Chunn, H. Boyd, & D. E. Lessard (Eds.), *Reaction and resistance: Feminism, law, and social change* (pp. 65-97). Vancouver, Canada: University of British Columbia Press.
- Miller, S. L. (1989). Unintended side effects of pro-arrest policies and their race and class implications for battered women: A cautionary note. *Criminal Justice Policy Review, 3*, 299-317.
- Miller, S. L. (2001). The paradox of women arrested for domestic violence: Criminal justice professionals and service providers respond. *Violence Against Women, 7*, 1339-1376.
- Miller, S. L. (2005). *Victims as offenders: The paradox of women's violence in relationships*. New Brunswick, NJ: Rutgers University Press.
- Miller, S. L., Gregory, C., & Iovanni, L. (2005). One size fits all? A gender-neutral approach to a gender-specific problem: Contrasting batterer treatment programs for male and female offenders. *Criminal Justice Policy Review, 16*, 336-359.
- Miller, S. L., & Meloy, M. L. (2006). Women's use of force: Voices of women arrested for domestic violence. *Violence Against Women, 12*, 89-115.
- Moore, A. D. (1995). Battered woman syndrome: Selling the shadow to support the substance. *Howard Law Journal, 38*, 297-352.
- Morse, B. J. (1995). Beyond the Conflict Tactics Scale: Assessing gender differences in partner violence. *Violence & Victims, 10*, 251-272.

- Nash, S. T. (2005). Through black eyes: African American women's constructions of their experiences with intimate male partner violence. *Violence Against Women, 11*, 1420-1440.
- Osthoff, S. (2002). But, Gertrude, I beg to differ, a hit is not a hit is not a hit: When battered women are arrested for assaulting their partners. *Violence Against Women, 8*, 1521-1544.
- Panchanadeswaran, S., & Koverola, C. (2005). The voices of battered women in India. *Violence Against Women, 11*, 736-758.
- Pate, A. M., & Hamilton, E. E. (1992). Formal and informal deterrents to domestic violence: The Dade County spouse assault experiment. *American Sociological Review, 57*, 691-697.
- Pence, E., Connelly, L., & Scaia, M. (2011). *Turning points: A nonviolence curriculum for women*. Grand Rapids, MN: Domestic Violence Turning Points.
- Pence, E., & Dasgupta, S. D. (2006). *Re-examining "battering": Are all acts of violence against intimate partners the same?* Duluth, MN: Praxis International.
- Pence, E., & Paymar, M. (1993). *Education groups for men who batter: The Duluth model*. New York: Springer.
- Potter, H. (2008). *Battle cries: Black women and intimate partner abuse*. New York: New York University Press.
- Prasad, S. (1999). Medicolegal response to violence against women in India. *Violence Against Women, 5*, 478-506.
- Rennison, C. M., & Welchans, S. (2000). *Intimate partner violence*. Washington, DC: Bureau of Justice Statistics, Office of Justice Programs, U.S. Department of Justice.
- Renzetti, C. (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.
- Richie, B. E. (2002). A Black feminist reflection on the antiviolence movement. *Signs, 25*, 1133-1137.
- Richie, B. (2012). *Arrested justice: Black women, violence, and America's prison nation*. New York: New York University Press.
- Roy, D. (2012). South Asian battered women's use of force against intimate male partners: A practice note. *Violence Against Women, 18*, 1108-1118.
- Sack, E. J. (2009). From the right of chastisement to the criminalization of domestic violence: A study in resistance to effective policy reform. *Thomas Jefferson Law Review, 32*, 31-63.
- Samuels, G. M., & Ross-Sheriff, F. (2008). Identity, oppression, and power: Feminisms and intersectionality theory. *Affilia, 23*, 5-9.
- Schechter, S. (1982). *Women and male violence: The visions and struggles of the battered women's movement*. Boston, MA: South End Press.
- Sherman, L. W., & Berk, R. A. (1984). The specific deterrent effects of arrest for domestic assault. *American Sociological Review, 49*, 261-272.
- Sherman, L. W., Smith, D. A., Schmidt, J. D., & Rogan, D. P. (1992). Crime, punishment, and stake in conformity: Legal and informal control of domestic violence. *American Sociological Review, 57*, 680-690.
- Sokoloff, N., & Dupont, I. (2005). Domestic violence at the intersections of race, class, and gender: Challenges and contributions to understanding violence against marginalized women in diverse communities. *Violence Against Women, 11*, 38-64.
- Stark, E. (1992). Framing and reframing battered women. In E. S. Buzawa and C. G. Buzawa (Eds.), *Domestic violence: The changing criminal justice response*. (pp. 271-292). Westport, CT: Auburn House.

- Stark, E. (2007). *Coercive control: The entrapment of women in personal life*. New York: Oxford University Press.
- Stets, J. E. (1990). Verbal and physical aggression in marriage. *Journal of Marriage and Family*, 52, 501-514.
- Straus, M. A. (1993). Physical assaults by wives: A major social problem. In R. J. Gelles & D. R. Loseke (Eds.), *Current controversies on family violence* (pp. 67-87). Newbury Park, CA: Sage.
- Swan, S. C., Gambone, L. J., Caldwell, J. E., Sullivan, T. P., & Snow, D. L. (2008). A review of research on women's use of violence with male intimate partners. *Violence & Victims*, 23, 301-314.
- Swan, S. C., Gambone, L. J., & Fields, A. (2005). *Technical report for an empirical examination of a theory of women's use of violence in intimate relationships*. Washington, DC: U.S. Department of Justice.
- Swan, S. C., Gambone, L. J., Lee Van Horn, M., Snow, D., & Sullivan, T. (2012). Factor structures for aggression and victimization among women who used aggression against male partners. *Violence Against Women*, 18, 1045-1066.
- Swan, S. C., & Snow, D. L. (2003). Behavioral and psychological differences among abused women who use violence in intimate relationships. *Violence Against Women*, 9, 75-109.
- Thureau, S., Le Blanc-Louvry, I., Thureau, S., Gricourt, C., & Proust, B. (2015). Conjugal violence: A comparison of violence against men by women and women by men. *Journal of Forensic and Legal Medicine*, 31, 42-46.
- U.S. Department of Justice & U.S. Department of Health and Human Services. (1996). *The validity and use of evidence concerning battering and its effects in criminal trials: Report responding to Section 40507 of the Violence Against Women Act*. Washington, DC: U.S. Department of Justice.
- Walker, L. E. A. (2017). *The battered woman syndrome* (4th ed.). New York: Springer.
- West, C. M. (2007). "Sorry, we have to take you in": Black battered women arrested for intimate partner violence. *Journal of Aggression, Maltreatment & Trauma*, 15, 95-121.
- West, C. M., & Rose, S. (2000). Dating aggression among low income African American youth: An examination of gender differences and antagonistic beliefs. *Violence Against Women*, 6, 470-494.
- Worcester, N. (2002). Women's use of force: Complexities and challenges of taking the issue seriously. *Violence Against Women*, 8, 1390-1415.

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