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## **Chapter 205: Including Pets in Domestic Violence Protective Orders**

*Regina Cabral Jones*

*Code Section Affected*

Family Code § 6320 (amended).  
SB 353 (Kuehl); 2007 STAT. Ch. 205.

### I. INTRODUCTION

After years of abuse and control, Susan Walsh knew it was time to leave her husband.<sup>1</sup> She had tried to leave before, but something always kept her from running.<sup>2</sup> What could make her stay with her abuser? It was the fear of returning to her thirty-two acre farm in Maine and finding another one of her beloved animals horribly maimed or killed.<sup>3</sup> When she had threatened to leave in the past, her husband had retaliated “by running over her blind and deaf border collie . . . , shooting two sheep, and wringing the necks of her prized turkeys.”<sup>4</sup> “It wasn’t just the cats and the dogs I had, it was the sheep and the chickens—I was terrified for their welfare,” she said.<sup>5</sup> “I knew if I were to leave, he wouldn’t hesitate to kill them. He had done it before.”<sup>6</sup>

Experts say stories like Susan Walsh’s are not unusual.<sup>7</sup> Research has established that pets are often used as weapons of coercion and control in abusive relationships.<sup>8</sup> Chapter 205 provides victims with a defense to this destructive and cruel manipulation by explicitly allowing courts to extend protective orders over the companion animals of those who have been victimized.<sup>9</sup>

### II. LEGAL BACKGROUND

The Family Code currently allows the courts to issue *ex parte* protective orders against the perpetrators of domestic violence.<sup>10</sup> Protective orders include

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1. Pam Belluck, *Battered Wives’ Pets Suffer Abuse, Too*, N.Y. TIMES, Apr. 1, 2006, at A10; ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 4 (June 19, 2007).

2. ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 4 (June 19, 2007).

3. *Id.*

4. *Id.*

5. *Id.*

6. *Id.*

7. *Id.*

8. *Id.*

9. CAL. FAM. CODE § 6320(b) (amended by Chapter 205).

10. CAL. FAM. CODE §§ 6300-6389 (West 2004 & Supp. 2007); *see also* CAL. PENAL CODE §

stay-away orders and orders prohibiting specific acts of abuse,<sup>11</sup> as well as “other specified behavior.”<sup>12</sup> Protective orders can be issued by a court<sup>13</sup> or, in the case of an emergency, by a judicial officer over the telephone.<sup>14</sup> Courts can also restrict an abuser’s custody and visitation rights to minor children,<sup>15</sup> and his or her rights to “use, possess[], and control . . . real or personal property.”<sup>16</sup>

While protective orders generally cover the victim, a court can extend the order to include “other named family or household members” upon a showing of good cause.<sup>17</sup> Prior to Chapter 205, however, the statute fell short of explicitly allowing a court to extend protection to family pets.<sup>18</sup>

### III. CHAPTER 205

The Legislature declares in Chapter 205 that there is a connection “between animal abuse, family violence, and other forms of community violence.”<sup>19</sup> This bill amends existing law to add animals to the list of victims that can receive the benefit of a protective order.<sup>20</sup>

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136.2(a)(1) (West 1999 & Supp. 2007) (allowing a court with jurisdiction over a criminal matter to issue protective orders pursuant to section 6320 of the Family Code).

11. Specific acts of abuse include “molesting, attacking, striking, stalking, threatening, sexually assaulting, battering, harassing, telephoning, including, but not limited to, annoying telephone calls as described in Section 653m of the Penal Code, destroying personal property, contacting, either directly or indirectly, by mail or otherwise, coming within a specified distance of, or disturbing the peace of the other party . . .” CAL. FAM. CODE § 6320.

12. *Id.* § 6218(a)-(c).

13. *Id.* §§ 6320-6327.

14. *Id.* § 6241.

15. *Id.* § 6323(a)(1).

16. *Id.* § 6324; *see also id.* § 6325 (West 2004) (providing that the court can also restrain a married person from taking action against “community, quasi-community, and separate property as provided in Section 2045”). Section 2045 of the Family Code provides that the court may issue *ex parte* restraining order preventing any person from disposing of any property “except in the usual course of business or for the necessities of life.” *Id.* § 2045.

17. *Id.* § 6320.

18. *See id.* (neglecting to mention family pets). Although the Family Code did not provide protection for animals until the enactment of Chapter 205, certain provisions of the Penal Code provide protection by prohibiting cruelty to animals. *See, e.g.,* CAL. PENAL CODE § 597(a) (West 1999) (providing that any person who “maliciously and intentionally maims, mutilates, tortures, or wounds a living animal, or maliciously and intentionally kills an animal” is subject to a fine of up to \$20,000 or imprisonment for up to a year, or both). However, these protections only come into play after an animal has been injured and fail to take into account the connections between domestic violence and animal abuse. *See* SENATE JUDICIARY COMMITTEE, COMMITTEE ANALYSIS OF SB 353, at 4 (Mar. 27, 2007) (citing the ASPCA’s findings that victims of domestic violence often report that their animals are threatened or killed by their abusers and the California Animal Association’s statement that the new law will prevent the abusers from using this technique to exert control over the victims).

19. 2007 Cal. Stat. ch. 205, § 1.

20. CAL. FAM. CODE § 6320(b) (amended by Chapter 205).

Specifically, Chapter 205 allows the court to,

[o]n a showing of good cause[,] . . . include in a protective order a grant to the petitioner of the exclusive care, possession, or control of any animal owned, possessed, leased, kept, or held by either the petitioner or the respondent or a minor child residing in the residence or household of either the petitioner or the respondent.<sup>21</sup>

The court may also “order the respondent to stay away from the animal and forbid the respondent from taking, transferring, encumbering, concealing, molesting, attacking, striking, threatening, harming, or otherwise disposing of the animal.”<sup>22</sup> Chapter 205 also requires the Judicial Council to modify its existing protective order forms to comply with the new law by July 1, 2009.<sup>23</sup>

#### IV. ANALYSIS OF CHAPTER 205

Abusers commonly use the threat of violence against a beloved pet to wield control over a victim.<sup>24</sup> Abusers take advantage of victims’ vulnerability and the bond they have with their pets, just as abusers do with victims’ children.<sup>25</sup> Chapter 205 combats this problem by allowing for protective court orders of “any animal owned, possessed, leased, kept, or held.”<sup>26</sup> The term “animal” is not

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21. *Id.* (amended by Chapter 205).

22. *Id.* (amended by Chapter 205).

23. *Id.* § 6320(c) (amended by Chapter 205).

24. See Dianna J. Gentry, *Including Companion Animals in Protective Orders: Curtailing the Reach of Domestic Violence*, 13 YALE J.L. & FEMINISM 97, 100 (2001) (providing a comprehensive overview of research pertaining to the link between domestic violence and animal abuse and urging legislation to include companion animals in protective orders to help combat this phenomenon).

25. See Joan E. Schaffner, *Linking Domestic Violence, Child Abuse, and Animal Cruelty*, A.B.A. TIPS ANIMAL L. COMM. NEWSL. (Chicago, Ill.), Winter 2006, <http://ssrn.com/abstract=1001255> (on file with the *McGeorge Law Review*) (“Family abuse and violence derives from a need to control and intimidate others who are more vulnerable. The abuser abuses the companion animal not only to injure the animal but to intimidate other family members, inflicting emotional and psychological harm.” (citation omitted)).

26. CAL. FAM. CODE § 6320(b) (amended by Chapter 205). California is not the first state to allow for protective orders of animals. Similar statutes exist in Maine, New York, and Vermont. See ME. REV. STAT. tit. 19-A, § 4007(1)(N) (1998 & Supp. 2007) (“Relief granted under this section may include: . . . Directing the care, custody or control of any animal owned, possessed, leased, kept or held by either party or a minor child residing in the household.”); N.Y. CRIM. PROC. LAW § 530.12(1)(f) (McKinney 1995 & Supp. 2007) (“[S]uch an order may require the defendant: . . . to refrain from intentionally injuring or killing, without justification, any companion animal the defendant knows to be owned, possessed, leased, kept or held by the victim or a minor child residing in the household.”); VT. STAT. ANN. tit. 15, § 1103(c)(7) (2007) (stating that, in cases involving abuse, the court may issue “an order concerning the possession, care and control of any animal owned, possessed, leased, kept, or held as a pet by either party or a minor child residing in the household”). Other states are considering, or have recently passed, similar legislation. See S.B. 284, 2007 Leg., Reg. Sess. (Conn. 2007) (enacted); H.B. 9, 95th Gen. Assembly, Reg. Sess. (Ill. 2007) (enacted); H.B. 727, 185th Gen. Ct., Reg. Sess. (Mass. 2007); H.B. 4741, 94th Leg., Reg. Sess. (Mich. 2007); A.B. 282, 2007 Leg., 74th Reg. Sess. (Nev. 2007) (enacted); A.B. 4026, 212th Leg., Reg. Sess. (N.J. 2007); H.B. 5185, 2007 Leg., Reg. Sess. (R.I. 2007); H.B. 1161, 105th Gen. Assembly, Reg. Sess. (Tenn. 2007) (enacted); S.B. 162, 2007 Leg., Reg. Sess. (Wis. 2007).

defined in Chapter 205; however, the language of the statute is broad enough to apply not only to pets but also to animals such as show dogs or race horses.<sup>27</sup> Some have criticized the potential for misuse of the protective order, such as in retaliation for other issues, to gain control in divorce proceedings, and, in the case of show animals, for financial gain.<sup>28</sup> However, Chapter 205 specifically calls for a “showing of good cause” before a court can issue such an order, which would give the respondent the opportunity to argue against the order before the judge.<sup>29</sup>

The only registered opposition to Chapter 205 was the Family Law Section of the California State Bar, which argued that the bill should be amended to require the court to allow “brief and peaceful contact as required for court-ordered visitation with children, unless a criminal protective order says otherwise.”<sup>30</sup> However, the current Judicial Council form for domestic violence protective orders<sup>31</sup> already includes this language in an optional checkbox and can easily be modified to include pets.<sup>32</sup> To include such language in the statute could compromise the court’s discretion and, according to Chapter 205’s supporters, is unnecessary.<sup>33</sup>

Chapter 205 may have a significant impact on local agencies. Including animals in protective orders will require state agencies to work together to stop the cycle of domestic violence against children and animals.<sup>34</sup> California is currently the only state that mandates (rather than merely permits) cross-reporting among social welfare agencies.<sup>35</sup> Animal control and humane society officers are among the mandated reporters listed in the statute.<sup>36</sup> While mandating cross-reporting is key to stopping domestic violence as soon as the signs are detected, cross-reporting can be time consuming and costly.

27. SENATE JUDICIARY COMMITTEE, COMMITTEE ANALYSIS OF SB 353, at 4 (Mar. 27, 2007); *see also* 4 AM. JUR. 2D *Animals* § 1 (2007) (“[I]n the language of the law, the word ‘animal’ is used to mean all animal life other than humans . . .”).

28. Jim Sanders, *Bill Seeks to Save Pets from Abuse in Disputes*, SACRAMENTO BEE, June 25, 2007, at A1.

29. CAL. FAM. CODE § 6320(b) (amended by Chapter 205).

30. ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 7 (June 19, 2007). The Family Law Section of the California State Bar eventually withdrew its opposition to Chapter 205. *See* SENATE FLOOR, COMMITTEE ANALYSIS OF SB 353, at 3-4 (July 13, 2007) (showing support for SB 353 (Chapter 205), but no opposition).

31. Judicial Council Form DV-130, Restraining Order After Hearing (Order of Protection), *available at* <http://www.courtinfo.ca.gov/forms/fillable/dv130.pdf>.

32. ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 7-8 (June 19, 2007).

33. *Id.* at 8.

34. *See* Schaffner, *supra* note 25 (describing the process that social service agencies may go through in a typical investigation of child or animal abuse).

35. *Id.* Some states allow permissive reporting. *See, e.g.*, L.D. 584, 123rd Leg., Reg. Sess., 2007 Me. Laws ch. 139 (permissive); L.D. 583, 123rd Leg., Reg. Sess., 2007 Me. Laws ch. 140 (permissive); S.B. 1017, 74th Leg. Assemb., Reg. Sess., 2007 Or. Laws ch. 731. (permissive). New York is currently considering mandatory reporting. *See* A.B. 1900, 2007 Leg., Reg. Sess. (N.Y. 2007) (mandatory).

36. CAL. PENAL CODE § 11165.7(a)(31) (West Supp. 2007).

Despite these concerns, Chapter 205 makes strides toward addressing the established connection between animal abuse and family violence, commonly referred to as the “Link.”<sup>37</sup> One of the first studies that described this Link found that of a survey of women with pets who had entered a shelter in northern Utah, seventy-one percent reported that their partner had threatened or actually hurt or killed one or more of their pets.<sup>38</sup> Another study of fifty of the largest shelters in the United States found that eighty-five percent of battered women and sixty-three percent of children with pets had experienced incidents of pet abuse.<sup>39</sup> If these figures are extrapolated nationwide, then there are potentially hundreds of thousands of people suffering from this especially twisted form of abuse.<sup>40</sup>

Perhaps the most alarming of these studies’ findings is that a substantial percentage of these victims feel that they cannot leave their abuser because they worry for the safety of their pets.<sup>41</sup> The American Society for the Prevention of Cruelty to Animals (ASPCA) affirms these findings, stating that “domestic violence victims report delaying the decision to go to a shelter or pursue other safety measures out of concern for the pet they would leave behind.”<sup>42</sup> Prior to Chapter 205, even if a victim was able to relocate his or her pet to a safe place

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37. Am. Humane Ass’n, Learn About the Link, [http://www.americanhumane.org/site/PageServer?pagename=lk\\_about](http://www.americanhumane.org/site/PageServer?pagename=lk_about) (last visited Aug. 4, 2007); see also SENATE JUDICIARY COMMITTEE, COMMITTEE ANALYSIS OF SB 353, at 2-5 (Mar. 27, 2007) (explaining the connection between animal abuse and family violence). There are also several studies that report that children who witness abuse, or are abused themselves, tend to, in turn, abuse animals. See Phil Arkow & Tracy Coppola, Expanding Protective Orders to Include Companion Animals 5 (2007), <http://www.americanhumane.org/site/DocServer/PetsinPO2007.pdf?docID=5061> (on file with the *McGeorge Law Review*) (describing the harmful effects upon children of witnessing domestic violence).

38. Frank R. Ascione, *Battered Women’s Reports of Their Partners’ and Their Children’s Cruelty to Animals*, 1 J. EMOTIONAL ABUSE 119, 125 (1998) [hereinafter Ascione, *Battered Women’s Reports*].

39. Frank R. Ascione et al., *The Abuse of Animals and Domestic Violence: A National Survey of Shelters for Women Who are Battered*, 5 SOC’Y & ANIMALS 205, 211-12 tbl.1 (1997), available at <http://www.syeta.org/sa/sa5.3/Ascione.html> [hereinafter Ascione et al., *The Abuse of Animals and Domestic Violence*].

40. See *id.*

Caution must be exercised in generalizing from this study’s sample to state and national samples; however, extrapolation of this study’s findings may help estimate the scope of the potential problem. For example, two million is a conservative estimate of the number of U.S. women assaulted by their male partners each year. If half of these women have companion animals (again, a conservative estimate), 71% partner cruelty to animals represents hundreds of thousands of families where companion animal victimization, actual or threatened, is part of the landscape of terror to which some women are exposed.

*Id.* (citations omitted).

41. Frank R. Ascione et al., *Battered Pets and Domestic Violence: Animal Abuse Reported by Women Experiencing Intimate Violence and by Nonabused Women*, 13 VIOLENCE AGAINST WOMEN 354, 364 (2007) (stating that a substantial portion of the women surveyed in shelters did not leave sooner because of their concern for their pets’ welfare); see also Catherine A. Faver & Elizabeth B. Strand, *To Leave or to Stay?: Battered Women’s Concern for Vulnerable Pets*, 18 J. INTERPERSONAL VIOLENCE 1367, 1374 (2003) (stating that over twenty-five percent of battered women surveyed reported that concern for their pets affected their decision to stay or leave their abuser); Ascione, *Battered Women’s Reports*, *supra* note 38, at 125 (stating that, in a sample of women with companion animals entering battered women’s shelters, nearly one in five (eighteen percent) reported that they had delayed entering the shelter because of concerns over the welfare of their pet).

42. ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 7 (June 19, 2007).

and secure a restraining order for themselves and their children, the danger still remained that the abuser might hurt or kill the animal to punish the victim for leaving.<sup>43</sup> As one new counselor at a battered women's shelter related,

What I wasn't prepared for were the pictures my first client brought to show me, apologetically, to explain why she had to return home. The pictures were of her "loving" husband cutting her beloved dog's ears off with a pair of garden shears. He had sent the ears along, too . . . .<sup>44</sup>

These studies, numerous other anecdotal reports, and news stories of actual or threatened animal abuse in violent households comprise a large and disturbing body of evidence demonstrating that the need for Chapter 205 is very real.<sup>45</sup> The ability of victims to ensure that their pet is included in a protective order is an essential step toward eliminating the cycle of domestic violence.<sup>46</sup>

Chapter 205 is also conducive to improving victims' perception of law enforcement.<sup>47</sup> Some victims of domestic violence report that the lackluster police response to complaints of animal abuse have contributed to their feelings of "isolation and helplessness."<sup>48</sup> When a domestic violence victim reaches out to law enforcement for help only to be confronted by a lackluster response, the victim may in turn come to marginalize his or her own abuse, allowing the abuser to capitalize upon the victim's resulting sense of powerlessness.<sup>49</sup> Chapter 205 addresses this by statutorily recognizing the seriousness of animal abuse, affirming its inherent connection to domestic violence and child abuse, and providing a legal remedy for victims to pursue.<sup>50</sup>

While Chapter 205 is a step towards helping people leave violent relationships, it does not explicitly address what actually happens to the animal when a victim is finally able to flee his or her abuser.<sup>51</sup> One study found that only

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43. Interview with Tam Ma, Policy Consultant, Office of Senator Sheila Kuehl, in Sacramento, Cal. (July 18, 2007) (notes on file with the *McGeorge Law Review*).

44. Arkow & Coppola, *supra* note 37, at 10-11.

45. See, e.g., ASSEMBLY COMMITTEE ON JUDICIARY, COMMITTEE ANALYSIS OF SB 353, at 4 (June 19, 2007) (citing research and anecdotal evidence describing animal abuse as a tool of manipulation).

46. See Ascione et al., *The Abuse of Animals and Domestic Violence*, *supra* note 39, at 214 ("Concern for companion animal welfare may actually delay a woman's seeking of shelter, and this is an obstacle that could be removed.").

47. See *cf.* FLA. SENATE COMM. ON CRIM. JUST., THE CONNECTION BETWEEN DOMESTIC VIOLENCE, CHILD ABUSE AND CRUELTY TO ANIMALS, Interim Project Report 2005-125, at 6-7 (2004), [http://www.flsenate.gov/data/Publications/2005/Senate/reports/interim\\_reports/pdf/2005-125cj.pdf](http://www.flsenate.gov/data/Publications/2005/Senate/reports/interim_reports/pdf/2005-125cj.pdf) (explaining the negative consequences when law enforcement officials "respond[] as if the animal cruelty is nothing serious").

48. *Id.* at 6.

49. *Id.* at 6-7.

50. See CAL. FAM. CODE § 6320(b) (amended by Chapter 205) (providing that animals may be included in domestic violence protective orders); 2007 Cal. Stat. ch. 205, § 1(a) ("The Legislature finds and declares the following: . . . There is a correlation between animal abuse, family violence, and other forms of community violence.").

51. See CAL. FAM. CODE § 6320(b) (amended by Chapter 205); Ascione et al., *The Abuse of Animals*

27.1 percent of domestic violence shelters ask about pets in the home on their intake forms.<sup>52</sup> Many emergency housing shelters are not able to accommodate animals at all and those that are may be able to shelter animals for only a short period of time.<sup>53</sup> The ability to secure a restraining order for a pet is an important first step, but without the accompanying public support infrastructure, it may not be enough.

One solution may be to develop a “Safe Havens for Animals” program in the community.<sup>54</sup> These programs provide those who advocate against domestic violence with the framework and resources to assist victims with safety planning for their companion animals, particularly with respect to referring the animals to local shelters, clinics, and foster families who elect to participate.<sup>55</sup> There are currently eight such programs in California.<sup>56</sup> Another program in Columbus, Ohio takes victims’ pets and places them in a women’s prison, where the inmates care for them.<sup>57</sup> This program has the dual benefit of encouraging more victims to leave their abusers, knowing that their animals will be safe, and of rehabilitating prisoners, who get the positive experience of responsibility and animal companionship.<sup>58</sup> As the founder of the Ohio program recently stated, “I think

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*and Domestic Violence*, *supra* note 39, at 213-16 (noting that there are a myriad of procedural, ethical, and other implications for domestic violence programs and animal welfare organizations when individuals have companion animals).

52. Ascione et al., *The Abuse of Animals and Domestic Violence*, *supra* note 39, at 212.

53. In an informal survey the author conducted of emergency shelters in the Sacramento area, two shelters stated that they do not accept pets and noted that no shelters they knew of in the area accepted animals. River City Community Services (RCCS) offers motel vouchers for those without shelter, but the motel does not accept pets. RCCS mentioned that although they are not a domestic violence-specific shelter, they do indeed see many cases of families trying to escape domestic violence. The Sacramento Area Emergency Housing Center (SAEHC) does not accept pets, does not inquire about pets on their intake forms, and does not collaborate with animal shelters except to refer individuals to the Animal Emergency Services program at Loaves and Fishes. According to SAEHC, the Loaves and Fishes program is the only facility in the Sacramento area that will take care of pets. This program is a dog and cat daycare kennel program, offering pet food, vaccinations, urgent medical care, and spay and neuter programs for the pets of homeless people. However, as it is only a day service, the pet’s owner must pick them up in the evening, which may not be an option for victims seeking shelter.

54. The Humane Society of the United States offers detailed information on its website on how to set up the framework for collaboration between domestic violence shelters, animal control agencies and shelters, and other animal care entities to provide a safe place for these threatened animals. *See* THE HUMANE SOC’Y OF THE U.S., STARTING A SAFE HAVENS FOR ANIMALS PROGRAM (2004), [http://files.hsus.org/web-files/PDF/2004\\_SafeHavens\\_Guide.pdf](http://files.hsus.org/web-files/PDF/2004_SafeHavens_Guide.pdf) [hereinafter SAFE HAVENS PROGRAM] (on file with the *McGeorge Law Review*).

55. *Id.* at 2, 4.

56. *See* Humane Soc’y of the U.S., Online Directory of Safe Havens for Animals™ Programs, [http://www.hsus.org/hsus\\_field/first\\_strike\\_the\\_connection\\_between\\_animal\\_cruelty\\_and\\_human\\_violence/safe\\_havens\\_for\\_animals/online\\_directory\\_of\\_safe\\_havens\\_for\\_animals\\_programs.html](http://www.hsus.org/hsus_field/first_strike_the_connection_between_animal_cruelty_and_human_violence/safe_havens_for_animals/online_directory_of_safe_havens_for_animals_programs.html) (last visited Feb. 17, 2008) (on file with the *McGeorge Law Review*) (listing Encinitas, Novato, Placerville, Redding, San Diego, San Francisco, San Mateo, and Sonora in the program directory).

57. Belluck, *supra* note 1.

58. *See* Michael Cody, Pet Safe Program for Both Domestic Violence and Animal Abuse: Pet Safe Program to Shelter Pets from Abuse, [http://www.petshealth.com/dr\\_library/petsafe.html](http://www.petshealth.com/dr_library/petsafe.html) (last visited Oct. 5, 2007) (on file with the *McGeorge Law Review*) (“[C]ombining security with an opportunity to educate prisoners makes sense . . .”).

everywhere there's a woman's safe house there needs to be a safe pets program."<sup>59</sup> For victims who are experiencing incredible anxiety and fear over their own abuse, the knowledge that their pet will be taken care of could be the tipping point toward freeing them from the bonds of their abusive relationship.<sup>60</sup>

Regardless of whether the Legislature opts to pursue these programs, one thing is certain: these issues require close collaboration between law enforcement, domestic violence shelters, and animal welfare organizations.<sup>61</sup> For instance, in Baltimore, Maryland, the police department requires its officers to look for signs of animal abuse every time a domestic violence incident is reported.<sup>62</sup> It will take the concerted efforts of all social service agencies to implement such collaborative policies for California to stem the epidemic of violence against adults, children, and their animals.<sup>63</sup>

## V. CONCLUSION

Chapter 205 will give back some of the power taken from the individuals and families who are struggling with the decision to leave their abuser. It allows California courts to make very clear that animal abuse, and its heinous effects on families, children, and the animals themselves, will not be tolerated.<sup>64</sup> The thousands of victims who are today weighing the decision to leave, aware of the potentially devastating effects upon their pets and their families, now have an opportunity to take that important step with the assurance that their pets will enjoy the same protection as their children and their property.<sup>65</sup> Hopefully, California social service agencies will respond to this important development by collaborating with each other, with private individuals, and with other organizations to create a network within which victims and their beloved pets may be kept safe. Maybe then there will be fewer stories like Susan Walsh's.<sup>66</sup>

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59. *Id.*

60. *See* Arkow & Coppola, *supra* note 37, at 6 ("Including the family pet in a protective order is critical toward breaking and even preventing the cycle of family violence.").

61. *See* SAFE HAVENS PROGRAM, *supra* note 54, at 2-3 ("Combining resources and expertise with other organizations will make the program more effective.").

62. *Cody*, *supra* note 58.

63. *See* SAFE HAVENS PROGRAM, *supra* note 54, at 2-3 (discussing the importance of all communities to have programs such as the Safe Havens program in order to allow agencies to fulfill their missions).

64. *Id.*

65. *Id.*

66. *See supra* Part I.