Constructing the Battered Woman

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IT HAS BEEN MORE THAN thirty years since feminists opened the first battered women's shelter in the United States. Feminist organizing has enhanced the safety of many women. Yet, despite organized and individual resistance by survivor activists and other feminists, batterers continue to abuse women. Many of those women are still unable to obtain the resources necessary to escape violence. Scarce funding, lack of access to political and social resources, and the entrenched capitalist, white supremacist heteropatriarchy of the United States impede the U.S. feminist antiviolence movement. Developing robust, effective feminist organizations in a patriarchal society presents a formidable challenge to women's movements. Feminist organizations frequently reproduce classist, racist, heterosexist, ableist, and sexist organizational forms and practices. In this article, which draws on my interview research, I contend that shelter workers are likely to perceive women abused by women rather than by men as not fitting their model of the "real battered woman." Such perceptions may lead workers to marginalize lesbians and bisexual women.[1]

Racism, sexism, classism, heterosexism, ableism, and other forms of oppression are institutionalized in complex ways in feminist organizations. Whatever their political commitments, workers in complex organi-

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zations tend to make decisions based on the "normal case" for their agencies.[2] For battered women's organizations, this normal case is the "normal battered woman" who comes to an agency for service. This normal case is not a simple composite of the clients the agency serves, but rather a sort of ideal type.[3] Workers' conceptions of the normal case are developed through making practical decisions about how to keep the organization running smoothly, through articulating the formal goals and guiding principles of the agency, and through interactions with clients. Workers and administrators frequently produce normal case categories based on the experiences of those at the top of the social hierarchy–in this case, white, heterosexual, temporarily able-bodied, middle-class, traditionally gendered women.

It is not realistic to try to eradicate normal case categories in organizations. Normal cases are not simply a form of bigotry that organizations can overcome through tactics such as antibias training. Robert Emerson argues that normal cases are instead categories that workers learn through experience and that are "organizationally sanctioned devices for assessing 'what is going on.'"[4] Although normal cases may not be simply stereotypes, they do typically embody many of the biases that are pervasive within dominant culture. Operating out of these normal case assumptions, workers may exclude, misunderstand, or mistreat individuals from marginalized groups, regardless of each worker's own identity, personal beliefs, and intentions, and regardless of the stated philosophy of the agency.

As staff of organizations with limited resources and large numbers of potential clients, shelter workers are faced with the task of turning down many potentially "legitimate" clients. The "ideal client" typology that workers (often unknowingly) draw on in making decisions allows them to make sense of interactions with clients and also builds workers' justifications for denying services to some potential clients. As Donileen Loseke demonstrates, analyzing what constitutes a "normal battered woman case" for workers from feminist organizations is critical for understanding the functioning of these organizations and for developing strategies for reform.[5]

As organizations growing out of feminist movements, battered women's shelters are especially vulnerable to contradictions between their stated

goals of "empowering women" and actual practices that reinforce dominant hierarchies. Although many feminist activists initially resisted structuring women's organizations as bureaucracies, a mélange of economic, political, and practical factors have led to the breakdown of many feminist collectives, reshaping organizations, including shelters, into hierarchical, bureaucratic structures.[6] Although feminist critiques have addressed the problems of reproduction of systems of inequality within bureaucracies, these analyses have not focused on the subtle functioning of normal case categories.[7]

Focus and Methods

Domestic violence has become recognized as a social problem in part because battered women's movement activists contested the conception of wives as the property of husbands, to be treated and "disciplined" as men saw fit.[8] The battered women's movement has nurtured the development of the social category of the "battered woman." This category is now used in a variety of discourses, including legal ("Battered Woman's Syndrome" in analysis of cases of battered women who injure or kill their abusers), medical (the training of doctors to recognize the signs and symptoms of domestic abuse), psychological (the development of individual and group therapy models for working with "battered women"), and theoretical (particularly in the development of feminist theory). Over time, activists and social service providers have developed a network of services to meet the needs of battered women, centered around domestic violence shelters. Because shelters are the primary institutional outgrowth of the battered women's movement, coordinating a wide range of services for abused women in both the shelter and the larger community, shelters are a valuable source of information about the construction of the concept of the "battered woman."

Battered women's shelters are not all the same. Some shelters have a social service approach (or even the goal of "keeping the family together") whereas others have a more politically rooted feminist focus. Certain shelters deviate substantially from the portrait I paint here. Nevertheless, the history and perspectives I depict represent general trends in the battered women's movement and its organizations, as

uncovered by my fieldwork and as presented in both movement and scholarly literature.

For this article, I draw primarily on interviews with shelter workers about how workers screen potential clients over the phone to determine if they are appropriate candidates for shelter stays, what workers expect residents to do while in shelter, and how workers come to decide that a particular woman is not appropriate to stay in a shelter or is not "really" battered. The interviews were conducted in two large U.S. midwestern cities and one city on the West Coast.[9]

Definitions of Battering and Battered Women

To decide which women should be housed in battered women's shelters, shelter workers, movement activists, and shelter administrators have developed a definition of battering. Definitions of the "battered woman" embody the ideological component of shelter workers' normal case constructs for potential clients.

Two of the groundbreaking, now classic, texts on battering are Lenore Walker's 1979, *The Battered Woman,* and Mildred Pagelow's 1981, *Woman-Battering: Victims and Their Experiences.* Pagelow defines battered women as "adult women who were intentionally physically abused in ways that caused pain or injury, or who were forced into involuntary action or restrained by force from voluntary action by adult men with whom they have or had established relationships, usually involving sexual intimacy, whether or not within a married state."[10] Walker gives a similar definition, but she includes psychological coercion and also adds:

> [I]n order to be classified as a battered woman, the couple must go through the battering cycle at least twice. Any woman may find herself in an abusive relationship with a man once. If it occurs a second time and she remains in the situation, she is defined as a battered woman.[11]

In the quotations above, Pagelow and Walker address only abuse perpetrated by men against women. Barbara Hart, whose work has focused on lesbian battering, builds on these definitions but adds that physical violence is not the only factor in determining whether one is battered; the victim must have experienced certain psychological effects.[12]

In her study of domestic violence shelters and workers' understandings of battered women, Loseke argues that the domestic violence movement does not construct certain violence in relationships as battering and this violence is therefore left out of feminist analysis.[13] For Pagelow and Walker, physical violence that is not repeated or that does not create ongoing intimidation is in some sense normalized. My research, as well, shows that some violence has been marginalized, if not normalized, in the movement.

Survivors, advocates, and theorists have tried to articulate the experiences that battered women have in common. To build a movement to serve battered women, identifying patterns in women's experiences of abuse is a crucial task, but one fraught with peril. Not only have many women's experiences been left out of these generalizations about battered women's experiences, but also theorists have used accounts of women's experiences to make claims about the characteristics of survivors. During interviews, I asked shelter workers, some of whom were survivors of domestic violence themselves, whether they saw common patterns among their clients or believed the clients had had common experiences. A worker I interviewed reported that the traits of many of her clients included "low self-esteem . . . most of the women that [have] really been battered really bad for a long time, they [are] really passive."

Another worker discussed the issue of verbal abuse along with victims' tendencies to blame themselves.

> There may or may not have been physical abuse, but they often talk about being put down on a daily basis, the verbal abuse, the emotional abuse. We hear a lot of that. The other common thing that we can see a lot of is the effects it has on women and children, and that being like low self-esteem. We have a lot of women who come in here and who wonder what it is they did to make this person do that to them, when in fact it's not their fault. They're not responsible for it. The stories are always different. Each woman has her own stories. But there certainly are similarities to people who are abusive, and to people who are the victims of that.

These statements move from noticing patterns of abuse to claiming that a battered woman is a certain type of person. Thus, instead of viewing a battered woman as someone with a particular set of experiences, workers often see a battered woman as someone with a particular set of traits.

When a worker does not believe that a woman has these traits, the worker is less likely to view this woman as a legitimate client. For many reasons that I will explore, women who have primary relationships with other women and/or have been abused by other women are less likely than heterosexual women to fit the workers' profile of the battered woman.

The Problem of Lesbian Domestic Violence

Despite idealized lesbian feminist images of women's nurturing and egalitarian relationships, survivors, activists, and social science researchers report that woman-to-woman domestic violence is prevalent and serious. Researchers have reported a wide range of prevalence in woman-to-woman battering, perhaps due to sampling biases, different data collection strategies, and variance in operationalizations of "battering." For example, JoAnn Loulan's nonrepresentative sample of 1,566 lesbians (92 percent white) found that only approximately 17 percent of lesbians she surveyed stated that a female "mate," "lover," or "friend" had abused them.[14] However, Gwat-Yong Lie and Sabrina Gentlewarrior, in another nonrepresentative sample of women attending the Michigan Womyn's Music Festival, found that 52 percent of their sample reported abuse by a previous partner.[15]

It is particularly difficult to estimate rates of woman-to-woman abuse because women abused by women may be less likely to seek help than women battered by men. One of the first questions most shelter workers ask a caller or a new resident is the identity of her batterer; thus an abused lesbian must either disclose her sexual identity, evade the question, or lie. Even a woman who is fearlessly "out" to her friends, family, and coworkers may not feel comfortable telling shelter staff of her lesbian, bisexual, or queer identity.[16] Considering the troubled history between the lesbian community and social service professionals, many women realistically fear homophobia and are reluctant to seek social services.[17]

The fear women abused by women have of seeking help from shelters is not unfounded. Some shelters only recently began accepting openly lesbian or bisexual clients, and according to one gay and lesbian antiviolence project director I interviewed, some shelters even in major urban centers still refuse to house lesbians. Even if "out" lesbians or bi-women are housed, shelter workers, social service professionals, and heterosexual

shelter residents may not treat them with respect. A former gay and lesbian antiviolence project director explained:

> There's a complicated and intricate system [of services to battered women]. When you talk about lesbian battering, you're talking about putting together threads that are disparate and not necessarily coordinated . . . and I think it partly depends on which city you're at, which day it is, which advocate you get. A lot of the survivors I dealt with talked about the "advocate from hell," you know, if you get a good advocate and you happen to call on the right night at the shelter, you're in good shape, if you call on the wrong night you're in very bad shape and then there's always the homophobia of the other women that might be in your survivor's group or at the shelter . . . it's not a pretty picture.

Shelters may earn negative reputations in lesbian, gay, bisexual, transgender, and/or queer (LGBTQ) communities for excluding or mistreating women abused by women. Furthermore, some survivors may avoid seeking shelter because their abusers may work at shelters or be closely connected with lesbian or feminist networks linked to shelters.

Because shelters collect much of the data available about battered women, the reluctance of some women in relationships with women to seek housing at domestic violence shelters, along with the closeted status of many lesbian, bisexual, and queer women in shelter programs, prevents the accurate documentation of incidences of woman-to-woman battering. Studies that do not depend on shelter statistics face the challenge of locating women partnered with women, still a comparatively invisible population in the contemporary United States. It is unlikely that researchers will be able to obtain representative samples in the near future.

Not only the prevalence, but also the nature of woman-to-woman abuse is in question; some researchers examining women's abuse of female partners emphasize that this violence can be quite similar to heterosexual battering, whereas other researchers have focused on the importance of recognizing differences between heterosexual and same-sex domestic violence.

The director of one large city's gay and lesbian antiviolence program told me in an interview: "I don't think there are a lot of differences [between heterosexual and woman-to-woman battering]. I think that some tactics that are used are a little bit different. One of the most common tac-

tics of control that I hear is, a batterer threatening to 'out' her partner if she tells anyone. But, I don't see a lot of difference."

Although women battered by women share many common experiences with heterosexual battered women, being in a same-sex relationship in a heterosexist society creates unique issues. Janice Ristock carefully documents many of these, including the particular vulnerability of women in their first lesbian relationship. Despite this evidence and despite calls for lesbian-specific and bi-specific services,[18] at the time of this study I could not locate any shelters in the United States that serve only lesbians or bi-women. Because battered women's programs are usually designed specifically to help heterosexual women and set up with the understanding that abuse is a behavior directed by men at women, lesbians and bi-women face particular problems within most shelters. The next section examines the "ideal" shelter client and the process workers use to determine whether to provide shelter to a particular woman.

"Appropriate" Clients: The Shelter Screening Process

Most domestic violence shelters are overwhelmed with requests for assistance. Every day, workers face the task of turning down many desperate callers seeking to escape painful, dangerous, and even deadly circumstances. Most of the shelter workers I interviewed said that their shelters were always full, and that often when they tried to refer callers to other shelters, the other shelters were also full. Shelters have limited resources such as, for example, physical housing space, openings in support groups, and advocate time. Therefore, shelters as organizations and workers as individuals develop both formal and informal guidelines for determining which clients are in the most dire situation, most likely to benefit from available services, and perhaps, most accommodating to the needs of the workers and their organization.

Workers usually conduct the first part of the screening process over the phone because, although some shelters are visible in their communities, most shelters have secret locations and publish only phone numbers. A woman calls the shelter and the worker determines if there is space in the shelter for that woman and any children she would bring. A worker's first

job is usually to determine whether the caller is in a safe place or might be in immediate danger from her batterer. One worker explains:

> What the advocates do when they're answering the crisis line is what we call screening the women. First of all, we have to determine if they're in need of safe housing, if there has been an incident or fear of an incident of violence, and basically determine if it's a homeless issue, which is always very tricky, because a lot of battered women are also homeless, and so sometimes we can't tell that over the phone. So they will accept the woman, bring her in, let her know that we will rescreen her in a couple of days. If we find that she's not appropriate, we will help her find other housing, whether that be a homeless shelter or wherever.

At some shelters, if a worker believes that a caller's situation is especially dangerous, the worker may "make space" for the caller by putting her up on a shelter couch until a room becomes available. This indicates that workers may sometimes have discretion in determining when a shelter is "full."

Assessing whether a caller is battered or a "nonbattered homeless woman" appears as a significant worker concern in many interviews. Workers have various strategies for determining whether a caller is homeless or not. Having experienced intimate violence does not guarantee that a woman will be categorized as a battered woman. One worker describes some of her reasons and methods for categorizing callers:

> Usually there are some women that they say are so-called "shelter hoppers" that go from one place to the next, and it's usually because of substance abuse. . . . They're just homeless and they're not suffering from any domestic violence, they just have nowhere to stay, which, there are specific shelters for that, so we would refer them out. . . . We try to screen them and see if they're appropriate for our program. . . . There's a whole list of ways to find out, but we ask them when was their last incident of abuse, and did they make a police report and did they have an Order of Protection. That's a big indicator right there. . . . It's basically your own judgment call, you just have to do a lot of intakes, and then you'll become more familiar. . . .

A key issue a worker tries to find out in the initial phone contact with a woman, then, is whether or not the caller has a "safety issue" and is trying to escape a dangerous batterer, or whether her problem is poverty and lack of affordable housing, which is not considered sufficient reason to

gain a space in a battered women's shelter. Women who have been battered but are not currently living with or endangered by their abusers are often classified as homeless.

Another worker described red flags in a phone screening that might tip her off that a caller was not appropriate for her shelter.

> She doesn't know where this abuser is, doesn't know where he lives, doesn't know his name, those are kind of the simpler ones. We might make a phone call to a social worker and find out that she's been shelter hopping, that she's not been in her own residence for four or five months, she's in and out of different shelters, which would be up on her computer stuff, if she's in the system [the electronic records kept by some public assistance social workers].

Once a woman gains entry to a shelter, she often faces a probationary period and additional screening, and in fact is housed only under the condition that staff members continue to perceive her as a "real battered woman," "in need of safe housing," and "able to be helped." Although it seems intuitively obvious that everyone is in need of safe housing, workers use the phrase to mean free shelter in a secured building with specific services for survivors of violence. A staff member will generally base her opinion of whether a resident is "really in need of safe housing" on how that resident interacts with shelter staff, how dedicated she appears to be to shelter meetings and programs, and how actively she appears to be searching for permanent housing. One worker elaborates:

> If housing is their only issue, then chances are it really is a homeless issue. Sometimes if a woman has been here for a length of time, at some point you may have to determine that she's no longer in need of safe housing. She is still a battered woman, but she is no longer in need of actual safe housing, and we may make a referral to a homeless shelter. [We decide that based on] . . . if she's seeing her abuser, that will sometimes be an indication to us that she's really not in need of safe housing. If she's here and she's not working the program. By that I mean: attending house meetings, coming to support groups, trying to get this information, she's just kind of . . . gone all day and back at curfew, what we kind of determine is that, it's not a safety issue.

Workers say that through experience they develop an ability to detect inappropriate clients. J. states, "You just have to do a lot of intakes." B. reports, "The instincts can tell you, if you be around people long enough, who's lying and who's telling the truth."

Although workers weren't always able to describe exactly how they were able to detect a "fake" when I asked directly, they eventually gave criteria for deciding when women were not really battered but rather just "using the shelter." J. told me:

> You just kind of notice it in their behavior, that they're not really concerned about their safety, you'll see they're breaking rules a lot, being out of the shelter when they know they're supposed to be here for meetings.

I asked B., "How can you tell if they're homeless?" She replied:

> They're not gonna follow house rules. . . . They hate support groups. . . . I have a woman in here now, she been in almost three months, I know she's homeless. Every time she goes to support group, she gets up and leaves. . . . Most homeless people, they take things, they steal, they don't want stability.

Not all the portraits the workers painted of homeless women were negative, and some of the workers stated that if women complied with shelter requirements, sometimes they could stay once they were admitted. Despite her comments above, B. also noted:

> Sometimes we have homeless women stay here, who work on their goals, they do what they have to do, they stay the ninety days [maximum stay for this shelter]. Because domestic violence brings about homelessness. Sometimes they get displaced and it's hard to get back.

In general, when workers perceive clients as "working on goals," the workers are more likely to believe that the clients are appropriate for shelter. From shelter staff's descriptions, "working on goals" appears to mean complying with the shelter's rules, attending house meetings, support groups, and counseling sessions, and appearing to look actively for housing or work.

Many shelter workers stressed that domestic violence shelters are different from homeless shelters in the programming they provide, particularly the forms of counseling targeted to survivors of violence. Because "real" battered women are constructed as women in pain who would want to seek help and support from staff, as well as to connect with the other residents with whom they are assumed to have many common experiences, women who do not actively participate in these programs may come under workers' suspicions.

Workers' vigilance in screening out "homeless" women presents many issues. We can consider any woman seeking emergency shelter homeless. The women whom workers are seeking to screen out are not simply the homeless, but rather women who are chronically destitute or women resistant to the discipline and structure that workers enforce in shelters. Many women experience extreme violence when living on the street or in homeless shelters. Much of this violence, although it involves brutality from intimates and includes chronic coercion and tactics of power and control, is not included in the discourse of "domestic violence," a term that insists that a victim have a domestic situation.[19] In addition to systematically discriminating against poor women, denying services to chronically impoverished homeless women also harms women who may be misrecognized as chronically homeless. Because a lesbian or bi-woman may not readily disclose the name of her batterer, may avoid support groups, and may appear evasive in counseling sessions in an effort to hide her sexual identity and protect herself from homophobia, lesbians and bi-women may be misrecognized as chronically homeless more readily than heterosexual women.

Problems for Lesbians and Bi-women in Predominantly Heterosexual Domestic Violence Programs

The category of the battered woman in the mainstream battered women's movement is implicitly heterosexual. The concept of domestic battery is also explicitly heterosexual in some states in the United States where orders of protection can only be obtained in cases of assaults by opposite sex partners. Shelter workers may not have a framework for understanding the circumstances and common problems facing women battered by female partners. Many of the workers I interviewed mentioned that they had sometimes worked with a client for some time before learning that the client was lesbian or bisexual. Workers typically expect women to have intimate relationships with men. Without cause to question their assumptions, workers' "normal battered woman case" is unlikely to include women battered by other women.

Shelter rules frequently mandate residents' attendance at support groups

and counseling. These potentially therapeutic encounters usually involve discussing the specifics of the abusive relationship, and women who wish to remain closeted about same-sex relationships cannot do so without lying. Certainly heterosexual women, as well, may have aspects of their experiences they do not feel comfortable opening up for public discussion. Yet, none of the workers I interviewed cited desire for privacy or closeted lesbian/bisexual status as a possible reason why a woman might avoid support groups or fail to attend counseling sessions. Rather workers identified resistance to counseling as warning signals that a woman might not be a "real battered woman."

Some shelter workers and administrators have received training about LGBTQ issues. One of the larger shelters where I gathered data had recently identified lesbians as a priority population for whom workers should make "extra efforts" to secure housing. Nevertheless, the limitation of the conceptual category of "battered woman" to heterosexual women can still prevent many workers from correctly identifying women abused by women as legitimate victims of abuse or accurately interpreting the behavior of queer women in shelter. One worker at a shelter that does include some LGBTQ issues in its training described her perceptions of how some workers seem to view battered lesbians.

> [Battered lesbians] are really confusing, because here is a woman who is coming for help because another woman had abused her, and can women really abuse women? And, because we are all the time talking about the patriarchy, and it's the men who abuse . . . can we take this seriously as really a case of serious abuse? And what kind of a woman is this who is letting another woman thrash her? If we really start talking too loud about lesbian battering, then we are really letting the men, the patriarchy, off the hook. If they see there are women who abuse other women, so what is the big deal? [Some women are] feeling like, it will make it easier for the [male] enemy then to shirk its responsibility.

Without the obvious gender cues of "male abuser/female victim," workers may perceive a woman who claims to be battered by another woman as participating equally in the violence rather than being victimized. When a woman calls the police after another woman beats her, the police may arrest both women, labeling the problem two-sided. Although mutual arrest has been a growing problem for heterosexual women, the risk of this is even greater for female couples.

Battered women's advocates generally decry the idea that a woman who strikes her violent male partner could be perpetrating abuse herself. These advocates have data to support their claims. Women in partnerships with men are unlikely to strike first, unlikely to use great force or weapons, unlikely to cause injury, and unlikely to provoke fear in male partners.[20] Furthermore, given advocates' assertions that battering is not just a matter of physical assault, but rather a pattern of effective, repeated coercive behavior, this type of pervasive control within a single relationship is not likely to be mutual. However, advocates may recognize this more in opposite-sex relationships than in same-sex relationships.

Nevertheless, Hart, the Lesbian Battering Intervention Project, Claire Renzetti, Joelle Taylor, and Tracey Chandler challenge the idea that "mutual battering" is a phenomenon among lesbians, asserting instead that only one partner can be a perpetrator if battering is defined as exerting an escalating pattern of damaging power and control in an intimate relationship.[21] When I asked the director of a gay and lesbian antiviolence project if she believed there could be mutual battering, she told me: "No, I don't. I think there can be some sort of mutual physical assault, and what that would entail would be someone fighting back, but my philosophy is that someone is in some sort of power position and has the control."

At the same time, researcher Ristock challenges many of the assumptions of battered women's movement organizers, including the refutation of mutual abuse and the focus on power and control as the heart of the experience of battering. She asserts that the issue of mutual abuse should not be considered a closed subject, instead exhorting activists and theorists to continue to explore women's accounts of their own experiences.[22]

Ristock individually interviewed two members of a lesbian couple in which one partner sometimes became enraged and bit, punched, or threw glasses of water at the other. The other partner identified as a survivor, but also believed that she had power in the relationship and said she did not fear her partner and would simply remove herself from the situation when her partner became violent. Although analysts could perceive this woman as minimizing or denying abuse, Ristock asserts that these types of stories should challenge battered women's movement organizers to expand framings of domestic violence and acknowledge the diversity of women's experiences.

To clarify, Ristock does not claim, nor would I, that battering is a "two-way street." Instead, Ristock, as well as Loseke, call us to recognize that there is violence and harmful behavior in relationships that is not "battering" as defined by the mainstream battered women's movement, but that still requires political, institutional, and theoretical responses. This requires us to reexamine our assumptions and go back to the complex and diverse experiences of survivors to understand the range of violent, coercive, and damaging behaviors in intimate relationships. We should hold perpetrators accountable, support victims, and at the same time recognize the possibility that contemporary theories and social service frameworks may not account for the complexities in the lives of all women and men. Individuals in both same-sex and opposite-sex couples may perpetrate or experience forms of violence that contemporary domestic violence theories do not explain.

Regardless of what researchers ultimately discover about diverse patterns of relationship violence, contemporary battered women's services are based on a model of abuse involving a violent, controlling man and a nonviolent, passive woman. To provide services to a potential client out of this framework, an advocate must determine who is the abuser and who is the victim. This not only marginalizes individuals who are victimized in relationship dynamics that do not neatly fit into this model, but this also presents special complications for same-sex relationships that *do* fit into a classic model of domestic abuse. When dealing with heterosexual couples, advocates have a very good chance (certainly not 100 percent) of being correct if they guess that the male is the perpetrator and the female is the victim,[23] although best practices clearly require a thorough assessment of a caller to determine who is the aggressor in the relationship. When dealing with same-sex couples, advocates cannot use gender as a proxy for controlling, violent behavior. It can be challenging to distinguish perpetrators from survivors because abusers commonly blame survivors and feel victimized in the relationship, whereas victims tend to take responsibility for the perpetrator's controlling behavior.[24] Advocates are also called on to recognize the difference between the abusive use of force and the use of force in self defense.

The director of a gay/lesbian antiviolence project noted in an interview

that her program only serves survivors, and sometimes she has to be careful when screening clients for services to determine whether a caller is a batterer or a survivor. Both might call the program requesting help. She describes how she determined that a gay male caller who identified as a victim was really an abuser.

Well, yeah, this gay male called last week, saying he needed an Order of Protection from his partner, and I asked him what happened, and he said that he shoved him, and, then I asked what led up to that, and he said, "Well, we had been fighting earlier, and I had taken the keys away from him because I didn't want him to go out. And he shoved me later." So, that's when kind of a warning signal went up, like maybe this isn't quite how it is. And then I asked, "Has it ever happened before?" And he said, "No, but he threatened to do it before," and then I said, "Well, what had he said?" And he said, "Well, there were times when I had too much to drink and I was kind of rough with him and he threatened to—" and *that's* when I was like, okay, and then I told him, I said, "You know, sometimes it's really unclear who's being battered and who's doing the battering, and I have to be honest with you, I'm really unclear about that right now, so I don't feel like we can help you at this point."

Most shelter workers I interviewed did not have training in distinguishing batterers from victims. When I specifically asked about the issue, one worker, M., mentioned:

[I]f you are a batterer, [you] would not have an incentive to call a shelter to come. The person who is in pain and is terrified is the one who calls. If you're a batterer, why would you want to go to a shelter, and then in counseling, what would you work on? Except if, you could be the batterer and then you decide you are the victim, and then you call . . . but because the cases are so few, it's really hard to comment.

Although M. and the other workers mentioned many times the difficulties in screening out people who called wanting to use shelter resources even though they are not "real battered women," in this case she wonders why you would call a shelter if you were not in pain or terrified. Although lesbian-specific counseling programs routinely perform assessments to determine whether a female caller is an abuser or perpetrator, shelter workers, serving a predominantly heterosexual population, generally lack the training to distinguish batterers from abusers based on behaviors and

dynamics, instead of based on gender. This presents problems. First, workers could unknowingly admit batterers into shelter. Second, workers could come to approach all lesbian and bi-women callers with excessive suspicion, fearing that any woman in a same-sex relationship is a batterer.

A lesbian could certainly risk losing her status as a "normal battered woman" if she discloses any history of using physical force against her partner. In the past, many workers in battered women's organizations did not consider it problematic for heterosexual women in a shelter to tell their stories of physically harming their abusive male partners (in self-defense, in a preemptive strike, in retaliation, or even in plain anger). Heterosexual women have sometimes been considered justified in striking the first blow, because battered women's movement activists explain that battered women can often tell when an abuser is gearing up for an assault, and the survivor may attempt to provoke an assault just to get it over with.

Although recently more and more heterosexual women are being arrested, convicted, and sent to anger management groups, perpetrator therapy groups, jails, and prisons because of alleged assaults against their male partners, workers may feel less suspicious of women who have hit men than of women who have hit women. Again, this lack of suspicion may be somewhat reasonable, when we consider copious data demonstrating that men are overwhelmingly responsible for perpetrating abuse in heterosexual relationships.[25] A woman who strikes her female partner, however, may be immediately viewed as a batterer. Yet, one study shows that battered lesbians are more likely to use force in self-defense compared with heterosexual women.[26]

Lesbians and bi-women may have difficulty fitting seamlessly into shelter environments designed for heterosexual women. As one worker at an urban shelter described, not just workers but also heterosexual residents may believe that lesbian residents are not "normal battered women", even when lesbian and heterosexual women have experienced similar patterns of abuse. J. made several different statements regarding how heterosexual residents find lesbians to be "strange," "odd," or "weird." J. mentioned that this reaction changed to curiosity when she talked with heterosexual residents about their own attitudes. J., who learned about same-sex domestic violence in a gay/lesbian antiviolence program, believes that if workers

intervene quickly by talking to heterosexual residents about tolerance when they make homophobic comments, female survivors who have female perpetrators can integrate more smoothly into communal living.

Shelter workers M. and B. discuss the problems that lesbian sexual relationships in shelters pose for communal living. They describe situations in which women had relationships with each other and disturbed shelter peace by having sex in bedrooms they shared with heterosexual women and by having "messy" breakups. Regarding sexual relationships in shelter, which are explicitly prohibited in the rules of her shelter, M. states, "I guess there is really nothing wrong with it, because they are peers, but it does create problems." Sexual relationships between women in shelter may endanger their status as "real battered women," because workers often expect the "normal battered woman" resident to passively accept rules and not stir up trouble.

Some of the challenges lesbians and bi-women face in shelter are similar to the challenges faced by other women who are discriminated against in U.S. institutions, including immigrant women, women with disabilities, and women of color. Women who are "out" about their same-sex relationships, women who do not fit neatly into gender role norms, and women who have worked in LGBTQ organizations may face discrimination in job and housing markets. In most parts of the United States, it is legal for an employer or landlord to discriminate on the basis of sexual identity. Because many shelters mandate that clients show evidence of constructive progress toward employment (particularly if they do not have children and are not eligible for public aid), lesbians and bi-women may be at risk for being labeled "lazy" or "uncooperative" by workers who either assume they are heterosexual or do not understand how heterosexism operates in the job market.

Lesbians and bi-women also face discrimination in the legal system. Some shelter workers view women's applications for orders for protection against their abusers as evidence of "real battering." Women who have been abused by women may fear involvement with a homophobic court system whose laws may treat same-sex domestic battery differently from heterosexual domestic battery and that could take away their children, humiliate and degrade them, or minimize or deny their experiences.

Thus, workers' assumptions that women in shelter have been battered by men, unless proven otherwise, renders invisible many of the special difficulties abused lesbians and bi-women face both in shelters and in the larger society. Although advocates and theorists have increasingly discussed the needs of LGBTQ survivors and the specifics of same-sex domestic abuse, most women battered by women still face serious barriers when they seek help in leaving a batterer.

The Current State of Services to LGBTQ Communities

The Chicago Metropolitan Battered Women's Network distributed a report to local service providers in 2000 detailing issues in services to LGBT survivors of domestic violence. This report was based on sixty-seven interviews conducted by members of the committee, including myself, with staff of thirty-six agencies in the Chicago metropolitan area. The report found that only two Chicago-area programs offer specific domestic violence survivor services to the LGBTQ population. One offers services to all LGBTQ survivors and one program offers services to lesbian and bisexual women survivors, while there are no programs for LGBTQ batterers. Most of the staff interviewed said they were unsure if their programs had served lesbians or bisexual women. They had not served bisexuals, gay men, or transgender people; at the same time, staff say they would not discriminate against any woman. Only one of the programs provides outreach to LGBTQ people, and most of the agencies did not have materials on LGBTQ issues visible. Some agencies would like to have in-services or in-house trainings about LGBTQ domestic violence but do not know how to obtain or provide this to their staff. Very few agencies currently have these types of trainings. Homophobia, heterosexism, and LGBTQ battering issues are not consistently and adequately covered in many forty-hour domestic violence trainings. Some agencies do cover heterosexism and homophobia but do not recognize the distinct differences that exist between heterosexual and LGBTQ battering. Most responding agencies were not aware that LGBTQ survivors have additional safety and confidentiality concerns; if they did recognize this, they did not have mechanisms to deal with it[27]

Based on the report, the Battered Women's Network recommends that

domestic violence service providers make several changes to improve services to LGBTQ communities. They encourage shelters and social service agencies working with survivors of domestic violence to use nongender-specific language in outreach materials, in public presentations, and when speaking with clients until a caller or client specifies their gender and the gender of their partner; provide training on LGBTQ issues to all staff; display LGBTQ specific materials in waiting rooms and offices; include LGBTQ people in nondiscrimination policies; create specific programs for lesbians, bi-women, bisexual men, gay men, and transgender survivors and batterers; and build collaborations with LGBTQ communities and organizations.

Some of the interviews with service providers at heterosexually focused domestic violence programs included revealing quotations. One service provider commented: "I don't see a need for [LGBTQ-specific services] right now. [LGBTQ people] do exist, but they never come to our agency." Another noted: "It is relevantly [sic] obvious that the batterer is male." A staff person from yet another agency said: "We haven't been approached by people of that kind [LGBTQ people]. We only serve normal people . . . people in normal relationships." This provider refers to relationships in which men abuse women as normal relationships.

Approximately 30 percent of providers indicated that they had had no experience serving LGBTQ clients. Of those providers who had spoken with LGBTQ people, the majority stated that they could not provide appropriate services to this population. Less than half of the programs had self-identified LGBTQ persons on staff. When asked how they would address the confidentiality concerns of an LGBTQ client who did not wish to disclose her or his sexual identity, most of the program staff did not believe that LGBTQ clients would have any unique confidentiality concerns and commented that the generic confidentiality policies of their agencies were sufficient.

The findings described by the Chicago Metropolitan Battered Women's Network in 2000 show that there have been few major changes since my earlier in-depth interviews. Although domestic violence services around the United States surely differ in their specificity and effectiveness in serving survivors of same-sex domestic abuse, researchers around the country

report similar inadequacies in services to LGBTQ communities. Ann Russo noted in 1999 that there were no shelters designed to serve lesbian clients specifically.[28] Ristock reported in 2002 that most of the battered lesbians she interviewed thought that shelters were set up to serve heterosexual women and therefore did not seek services there.[29] For men battered by men, bisexual women, and all transgender survivors, the state of available services is probably even more limited than for traditionally gendered lesbians. Sarah Sulis wrote in 1999, "no research exists about the experiences of battered bisexual women."[30] David Island and Patrick Letellier comment on the scarcity of services for gay men who have been abused.[31] Robb Johnson found in 1999 that only eight U.S. cities had groups for gay and bisexual male survivors. He also notes that transgender survivors "have typically encountered as much or more difficulty accessing domestic violence services as have gay and bisexual men."[32]

Although both researchers and activists have increasingly recognized the existence of same-sex domestic abuse in the past five to ten years, services to survivors of same-sex abuse lag behind services available for heterosexual survivors. Survivors of same-sex abuse who are women of color, immigrant women, women with disabilities or mental illness, chronically homeless women, transgender women, and women who have been hurt in systems of prostitution face particularly formidable barriers in accessing help on their own terms.[33]

Expanding Constructions of Domestic Violence

The collective representation of battering Loseke found in use in battered women's shelters is based on images of abused *wives*.[34] Although the language of the movement has been extended to include nonmarried women who suffer from "partner abuse," the construction of domestic violence has been made up of images of violent men and injured women. The definitions of battering offered by Walker and Pagelow refer exclusively to male on female violence. Feminist theories of battering have been based on the understanding of battering as a manifestation of gender inequality, growing out of patriarchy.[35]

Developing an analysis of domestic violence within the context of gender power differentials in patriarchal culture is critical to understanding

and intervening in both heterosexual and same-sex domestic violence. But along with examining systems of sexism, we must also consider how racism, classism, religious bigotry, cultural imperialism, ableism, heterosexism, genderism (as a bias toward traditional gender categories and against transgender people), and a host of individual factors can promote domestic abuse. As Russo argues in her powerful book, *Taking Back Our Lives,* locating our understanding of domestic violence in the intersection of multiple, intersecting oppressions allows us to understand each survivor's experience more fully.[36]

There appears to be no comprehensive theory of domestic assault patterns that holds for all heterosexuals as well as all lesbians and bi-women. Why does one woman batter another woman? Although theorists have looked to personal psychopathology (usually some form of antisocial behavior by the perpetrator), internalized homophobia, family history, and internalized sexism to explain woman-to-woman battering, there is insufficient evidence to link any battering solely to established categories of psychological disorders or to any one of these factors alone.[37] Is it reasonable to seek parsimony in a theory of domestic violence? Valerie Coleman contends we need multidimensional theory addressing sociopolitical factors, social learning, family dynamics, physiology, and individual personality to fully understand domestic violence. She notes that we can better understand domestic violence if we recognize that individual factors, as well as sociopolitical issues, can be significant mediating variables in domestic violence.[38] Gregory Merrill similarly contends that domestic violence must be analyzed as both a social and a psychological phenomenon.[39]

Victims of same-sex battering face some psychological issues and social experiences that heterosexual women do not. And although heterosexism and homophobia provide particular motivations and opportunities for individuals to batter their same-sex partners, Ristock, similar to Russo, asserts that we must consider how multiple systems of oppression such as misogyny, heterosexism, and colonialism "give permission for abuse, provide its logic, and may even encourage it."[40]

Ristock does not believe that a single theory can explain all forms of intimate partner violence. She argues that many authors have focused too much on similarities between lesbian and heterosexual battering. These

authors have pointed out some of the distinct tactics in same-sex battering (such as threats of outing rather than using male privilege) and how police, courts, and service providers marginalize and harm survivors through homophobia and heterosexism. Yet, Ristock's interviews show that differences between opposite-sex and same-sex abuse are more profound. This calls for research with grounded theory approaches that start from the experiences of lesbian and bi-women survivors, instead of seeking ways to fit lesbian and bi-women's experiences into theories built on the experiences of heterosexual women.[41] Ristock writes:

> Rather than creating typologies or correlates of lesbian partner violence, I have found it more helpful to consider a range of contextual factors that surround abusive relationships. For instance, there are social contexts that create isolation and invisibility for lesbians and that in turn may contribute to the risk of violence. These include contexts of first relationships, contexts of the closet and homophobia, and contexts of dislocation such as recent immigration. There are also contexts in which violence is normalized. These can include using drugs and alcohol, having a history of previous abuse, and experiencing a lifetime of previous abuse in a context of poverty and racism. Each of these contextual factors may increase the probability of experiencing or committing violence; however, this does not mean that they cause violence or that individual women in such contexts make risky partners.[42]

Revised theoretical framings such as Russo's and new empirical data such as Ristock's help point the way for survivors, activists, and researchers to continue to re-vision what battering is and what we need to do about it.[43]

Conclusion

Shelters have become a primary form of organization for the battered women's movement, and yet most battered women never receive shelter services. Shelter services marginalize some survivors and exclude others altogether. Although shelters provide crucial services and need support, activists need to move beyond shelters to develop new organizations to combat violence. We need organizations that will not be bound by the practical, political, and financial constraints facing shelters, that recognize the multiple forms of oppression that survivors of violence face, and that address the specificity of each survivor's situation. In developing new

structures and strategies, we need to begin with the lived experiences of immigrant women, women of color, women with disabilities, women working in prostitution, women who live on the streets, male survivors, and transgender survivors. Just as the real study of women's history cannot be based on "adding women and stirring" into a male-centered curriculum, inclusive services for survivors of violence cannot be provided by organizations built on white, middle-class, heterosexual experiences that try to address the needs of "other" women and men.

Workers help produce and enforce "normal case" constructions of battered women that often exclude women battered by women, poor women, and other marginalized women. Yet, clearly, workers are not villains in this account of the problems faced by battered lesbians, bi-women, and chronically homeless women seeking shelter. The problem is rooted in conceptions of battering, in organizational forms, and ultimately in the sexism, racism, classism, and heterosexism embedded in social structures from the global economy to the legal system to the nuclear family. Understanding the subtle functioning of normal case categories gives us power to reconstruct or broaden those categories to include more people.

Addressing the experiences and needs of transgender survivors of domestic violence is a particularly important step in moving antiviolence organizing toward more inclusive and effective activism. This community has been uniquely oppressed and excluded in both patriarchal society and in feminist and lesbian/gay/bisexual organizations. Yet, the reconceptualizations of gender called for by many transgender activists holds great promise for fighting the oppression of transgender people as well as the gender-based oppression of women.[44]

As long as shelters lack resources to help more women, more intensively, over longer periods of time, workers will continue having to make hard decisions about whom to help. As long as social service and social change organizations fail to challenge conceptual assumptions based on the experiences of white, middle-class, heterosexual women, we will fail to create the social change we need. To help survivors in crisis, the battered women's movement has focused its efforts on building social service organizations. These agencies often address the needs of battered women based largely on the practical needs of the agency. In doing so, a multiplicity of

people have been marginalized in our organizations, and many potential allies have been excluded from our social change work. The battered women's movement must expand its organizing to build new types of organizations and to ally with movements for economic justice, racial equality, equal rights for people with disabilities, and LGBTQ and immigrants' rights.

Notes

1. This research focuses on women battered by women in intimate partnerships. These survivors may identify as lesbian, bisexual, queer, straight, or otherwise. Separating out the specific and unique experiences of survivors who are lesbian, bisexual, transgender, two-spirit, queer, or male is crucial for building the antiviolence movement, but beyond the scope of this article.
2. David Sudnow, "Normal Crimes: Sociological Features of the Penal Code in a Public Defender Office," *Social Problems* 12 (Winter 1965): 255-77; Michael Lipsky, *Street-Level Bureaucracy: Dilemmas of the Individual in Public Services* (New York: Russell Sage, 1980); Robert Emerson, "Disputes in Public Bureaucracies," in *Studies in Law, Politics, and Society*, vol. 12, part A, ed. Susan S. Sibley and Austin Saurat (Greenwich, Conn.: JAI Press, 1992), 3-29.
3. Donileen Loseke, *The Battered Woman and Shelters: The Social Construction of Wife Abuse* (Albany: State University of New York Press, 1992).
4. Emerson, "Disputes in Public Bureaucracies."
5. Loseke, *The Battered Woman and Shelters.*
6. Jane Mansbridge, *Beyond Adversary Democracy* (New York: Basic Books, 1980); Nancy Matthews, *Confronting Rape: The Feminist Anti-Rape Movement and the State* (New York: Routledge, 1994).
7. Kathy E. Ferguson, *The Feminist Case against Bureaucracy* (Philadelphia: Temple University Press, 1984).
8. R. Emerson Dobash and Russell Dobash, *Women, Violence, and Social Change* (New York: Routledge, 1992).
9. The shelters in which I gathered data housed between eight and forty-five women. My data include sixteen interviews with thirteen women representing seven different shelters in three cities between March and August 1995. Nine interviewees were shelter workers, two were current or former gay/lesbian antiviolence program directors, one was a former homeless shelter director, and one is currently a safe house director. Two of the interviewees were former supervisors of mine from my previous work at a homeless shelter and battered women's shelter, several were people I had met working in social service, and the others were women I cold-called at their agencies. I have been involved as a worker or volunteer at various women's organizations over the past fourteen years. I also examined agency documents and used data from a survey conducted by a battered women's organization and distributed to other such

organizations in 2000. Shelters in one midwestern city housed primarily women of color, whereas most of the shelters in the other midwestern city and on the West Coast served a large percentage of white women; however, one of these specialized in providing services to Latinas. The names of shelters and interviewees have been changed to protect privacy.

10. Mildred Pagelow, *Woman-Battering: Victims and Their Experiences* (Beverly Hills, Calif.: Sage Publications, 1981), 33.
11. Lenore Walker, *The Battered Woman* (New York: Harper & Row, 1979), xv.
12. Barbara Hart, "Lesbian Battering: An Examination," in *Naming the Violence: Speaking Out about Lesbian Battering*, ed. Kerry Lobel (Seal Press: Seattle, 1986), 173-89.
13. Loseke, *The Battered Woman and Shelters.*
14. JoAnn Loulan, *Lesbian Passion: Loving Ourselves and Each Other* (San Francisco: Spinsters/Aunt Lute, 1987).
15. Gwat-Yong Lie and Sabrina Gentlewarrior, "Intimate Violence in Lesbian Relationships: Discussion of Survey Findings and Practice Implications," *Journal of Social Service Research* 15, nos. 1/2 (1991): 41-59.
16. Some women who do not identify as heterosexual also do not identify as lesbian or bisexual, but rather use the term "queer" to describe an identity that is in one way or another not straight yet also not inside the lesbian/bisexual/heterosexual categorization system. Some people identify themselves using yet other terms that are not discussed here. The term "queer" is contested; although some women identify with it, others consider it an insult.
17. Homosexual identification was listed in the *Diagnostic and Statistical Manual of Mental Disorders* as a mental illness until 1973.
18. Ann Russo, *Taking Back Our Lives: A Call to Action for the Feminist Movement* (New York: Routledge, 2001); Sarah Sulis, "Battered Bisexual Women," 173-80, Jennifer Grant, for the San Francisco Network for Battered Lesbians and Bisexual Women, 183-92, Charlene Allen and Beth Levanthal, "History, Culture, and Identity: What Makes GLBT Battering Different," 73-81, all in *Same-Sex Domestic Violence: Strategies for Change*, ed. Beth Levanthal and Sandra Lundy (Thousand Oaks, Calif.: Sage Publications, 1999); American Psychiatric Association Committee on Nomenclature and Statistics, *Diagnostic and Statistical Manual of Mental Disorders*, 2d ed. (Washington, D.C.: American Psychiatric Association, 1968).
19. Janice Ristock, *No More Secrets: Violence in Lesbian Relationships* (New York: Routledge, 2002).
20. Demie Kurz, "Physical Assaults by Husbands: A Major Social Problem," in *Current Controversies on Family Violence*, ed. Richard J. Gelles and Donileen R. Loseke (Newbury Park, Calif.: Sage Publications, 1993), 88-103.
21. Hart, "Lesbian Battering"; Lesbian Battering Intervention Project taskforce; Claire Renzetti, *Violent Betrayal: Partner Abuse in Lesbian Relationships* (Newbury Park, Calif.: Sage Publications, 1992); Joelle Taylor and Tracey Chandler, *Lesbians Talk Violent Relationships* (London: Scarlet Press, 1995).
22. Ristock, *No More Secrets.*

23. Lawrence Greenfeld et al., "Violence by Intimates: Analysis of Data on Crimes by Current or Former Spouses, Boyfriends, and Girlfriends" (Washington, D.C.: U.S. Department of Justice, Bureau of Justice Statistics, 1998), see www.ojp.usdoj.gov/bjs/absract/vi.htm.
24. Renzetti, *Violent Betrayal.*
25. Callie Marie Rennison and Sarah Welchans, "Intimate Partner Violence" (Washington D.C.: U.S. Department of Justice, Bureau of Justice Statistics, May 2000).
26. Lydia Walker, "Battered Women's Shelters and Work with Battered Lesbians," in *Naming the Violence: Speaking Out about Lesbian Battering,* ed. Kerry Lobel (Seattle: Seal Press, 1986).
27. Chicago Metropolitan Battered Women's Network–Lesbian, Bisexual, Transgender Women's Battering Issues Committee, "Chicagoland Domestic Violence Services Available to Lesbian, Gay, Bisexual, and Transgender Survivors of Domestic Violence: Summary Report" (Chicago: Chicago Metropolitan Battered Women's Network, 2000), 4-5.
28. Ann Russo, "Lesbians Organizing Lesbians against Battering," in *Same-Sex Domestic Violence*, 83-96.
29. Ristock, *No More Secrets.*
30. Sulis, "Battered Bisexual Women," 175.
31. David Island and Patrick Letellier, *Men Who Beat the Men Who Love Them: Battered Gay Men and Domestic Violence* (New York: Harrington Park Press, 1991).
32. Robb Johnson, "Groups for Gay and Bisexual Male Survivors," in *Same-Sex Domestic Violence*, 215-28, esp. 218.
33. Valli Kanuha, "Compounding the Triple Jeopardy: Battering in Lesbian of Color Relationships," *Women and Therapy* 9 (1990): 169-84; Helen Zia, "Violence in Our Communities: Where Are the Asian Women?" in *Making More Waves: New Writing by Asian American Women*, ed. Elaine Kim, Lilia Villanueva, and Asian Women United of California (Boston: Beacon Press, 1997), 207-14; Martha Lucia Garcia, "A 'New Kind' of Battered Woman: Challenges for the Movement," in *Same-Sex Domestic Violence,* 163-72; Norma Hotaling, "Making the Harm Visible," in *Making the Harm Visible: Global Sexual Exploitation of Women and Girls: Speaking Out and Providing Services*, ed. Donna Hughes and Claire Roche (Kingston, R.I.: Coalition against Trafficking in Women, 1999), 227-32.
34. Loseke, *The Battered Woman and Shelters.*
35. Michele Bograd, "Feminist Perspectives on Wife Abuse: An Introduction," in *Feminist Perspectives on Wife Abuse*, ed. Kersti Yllö and Michele Bograd (Newbury Park, Calif.: Sage Publications, 1988), 11-26.
36. Russo, *Taking Back Our Lives.*
37. Valerie Coleman, "Lesbian Battering: The Relationship between Personality and the Perpetration of Violence," *Violence and Victims* 9 (Summer 1994): 139-52.
38. Coleman, "Lesbian Battering," 141-42.
39. Gregory Merrill, "Ruling the Exceptions: Same-Sex Battering and Domestic Violence Theory," in *Violence in Gay and Lesbian Domestic Partnerships*, ed. Claire Renzetti and Charles Miley (New York: Harrington Park Press, 1996), 9-22.

40. Ristock, *No More Secrets*, 55.
41. Barney Glaser and Anselm L. Strauss, *The Discovery of Grounded Theory: Strategies for Qualitative Research* (Chicago: Aldine de Gruyter, 1967).
42. Ristock, *No More Secrets*, 58.
43. Russo, *Taking Back Our Lives*; Ristock, *No More Secrets*.
44. Leslie Feinberg, *Trans Liberation: Beyond Pink or Blue* (Boston: Beacon Press, 1998).