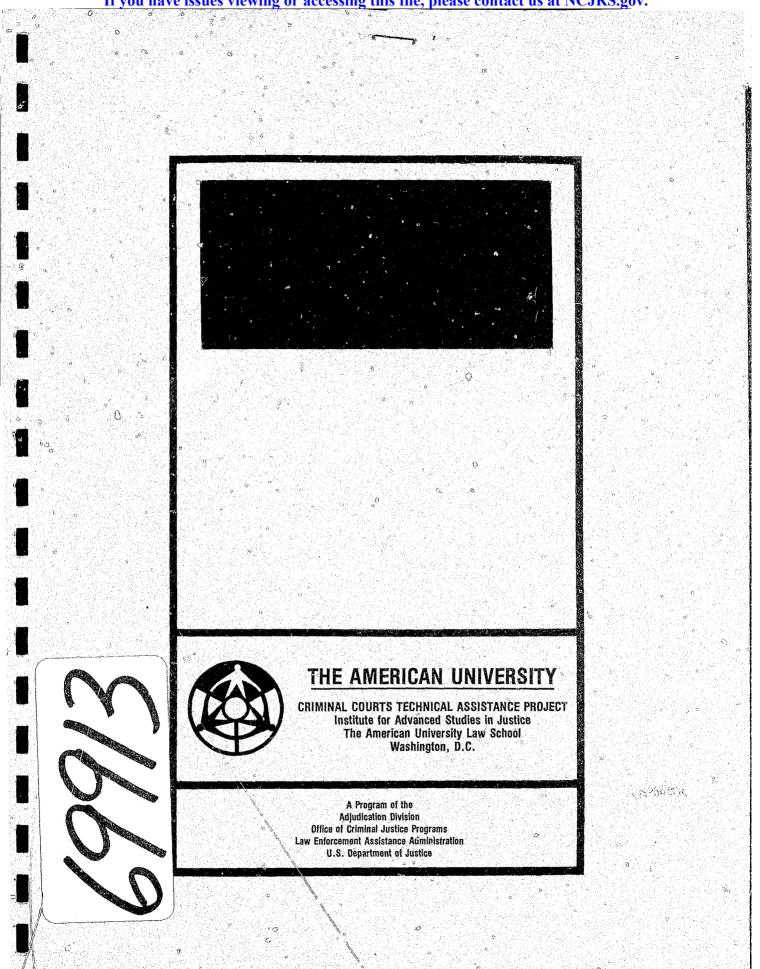
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# A REVIEW OF THE DISTRICT OF COLUMBIA CITIZENS' COMPLAINT CENTER: Follow-Up Study

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March 1980

AUG 7 1980

ACQUISITIONS

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#### I. INTRODUCTION

During 1975-76, LEAA's Criminal Courts Technical Assistance Project at The American University conducted a comprehensive review of the operations of the District of Columbia's Citizen's Complaint Center (CCC) which had been created as a cooperative effort of three District of Columbia agencies to offer alternatives to criminal prosecution, where appropriate, for the resolution of intrafamily and other disputes. The three agencies involved with the CCC's operation were: the United States Attorney's Office for the District of Columbia, the District of Columbia Corporation Counsel, and the Social Services Division (Intrafamily Branch of the Superior Court of the District of Columbia). Each of these agencies had been given powers, under a recent statute, to develop alternatives to criminal prosecution for intrafamily disputes and, through the CCC, provided informal hearings, crisis intervention counseling and other resources for those complaints for which criminal prosecution was deemed appropriate.

The study which the CCTAP conducted was requested by the U.S. Attorney's Office and designed to assist the CCC and those agencies involved in its operation with:

- (1) formulating and clarifying the goals and objectives of the program;
- (2) developing a case management and processing system and identifying the resources needed for its operation;
- (3) clarifying current methods of interface with other agencies and recommending steps to improve that interface; and
- (4) preparing an operating manual for future use.

The study team assembled by the CCTAP consisted of David Austern, Paul Rice and Michael F. Anderson, with limited additional consultant assistance from other individuals with experience and expertise specifically relevant to the study. The report of this effort was submitted to the U.S. Attorney's Office in August 1976. At that time, the study team described the CCC as a loose-knit program that was predominantly operated by the employees of the U.S. Attorney's Office, and nominally supported and participated in by the Office of the Corporation Counsel and the Department of Social Services. The team found that the program was without records, without defined goals, without guidelines for its employees, with too few personnel, and with no one conducting mediation hearings who was trained in that method of dispute resolution. As a consequence, the team concluded that the CCC was providing too few services at too great a cost and recommended that extensive changes be made.

During the period since the report was submitted, considerable effort was made to address the concerns of the CCTAP consultants. In 1978, the District of Columbia Office of Criminal Justice Plans and Analysis (SPA) awarded a contract to the Center for Community Justice to administer the CCC within the context of the interagency arrangement established for the CCC's operation.

In January 1980, Betsy Reveal, SPA Director, Henry F. Greene, Jr., of the U.S. Attorney's Office and Linda Singer, Executive Director of the Center for Community Justice asked the CCTAP to conduct a brief, follow-up study of the CCC's operations, with particular attention to the following areas: (1) the responsiveness of the dispute mechanism available through the CCC to those whom make use of it; (2) the interest of the community in using CCC services; (3) suggestions regarding information that should be maintained in order to adequately evaluate and monitor the CCC's operations; and (4) an assessment of efforts to date to implement the 1976 CCTAP report recommendations. It was agreed at the outset, that because of the limited resources available for this follow-up study, and the limited period during which the "reorganized" CCC had

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been in operation, these issues would serve as a broad frame of reference but could be addressed in only a preliminary manner -- primarily through interviews with those currently involved with the CCC program and observations of the CCC's operation.

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The consultants assigned by the CCTAP to conduct this follow-up study were: Leon Leiberg, a private consultant who had extensive operational experience with alternative criminal justice programs, and Professor Paul Rice of The American University Law School and a member of the original 1976 study team. Their study was conducted during January and February, 1980 during which time they spoke with each member of the CCC staff, officials of the U.S. Attorney's Office, Corporation Counsel and SPA, and others involved with the CCC program. All of the parties contacted were helpful and interested in the program reviews. Opportunity was provided twice for feedback and clarification -- in an initial informal staff debriefing and later in a more formal review of the findings and recommendations in the U.S. Attorney's Office.

Users of the CCC were not interviewed. Rather, observations at the points of intake and screening were made and previously written comments obtained by CCC staff from the target population and available project files examined. All interviews were conducted in a non-structured manner to obtain perceptions and suggestions on all facets of project operations that were familiar to the interviewees. Additionally, all periodic reports, training materials and program descriptions which could be obtained were read and examined (See Appendix). During the course of the study, it became apparent that improvements in office layout in the CCC's new facility could contribute measurably to the program's operation. Limited additional consultant assistance was therefore made available by the CCTAP for review of renovation plans by a justice facility specialist,

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Lawrence Siegel. Mr. Siegel's comments were incorporated, as appropriate, into the renovation plans and are therefore not included in this report.

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The observations and recommendations which follow address both general and specific facets of the program operation which the consultants observed. By necessity they are somewhat general but, hopefully, they will assist the administrators in strengthening and improving the CCC's operations.

#### II. OBSERVATIONS

## A. General

Although the program today is different and improved in many repects from that operating in 1976, its structure is predominantly the same and it still lacks clearly defined goals and operational guidelines. The improvements which have been made since the earlier CCTAP study are in the following areas: (1) in the area of record keeping, which insures the availability of data for evaluation purposes;<sup>1</sup> (2) in the number of personnel, both hired and volunteer, which appears to have reduced the waiting time for participants;<sup>2</sup> (3) in the physical facility, which is more comfortable and which provides adequate space to insure privacy for the participants;<sup>3</sup> (4) in increased efforts to coordinate the CCC's undertakings through the presence of a full-time director; and (5) in the use of trained mediators to conduct hearings. This last improvement, although potentially one of the most significant, has had little impact on the business of the CCC because so few cases have been handled by the mediators.

In the last three months of 1979 the CCC received 2,021 complaints. Only 15 percent of those complaints (318) were scheduled for hearings with the

<sup>1</sup>The data collected, however, should be compiled and evaluated on a more regular basis.

<sup>2</sup>The lengthy delays of three or more hours that were common in the past, now appear to be infrequent. It is reported by the staff of the CCC that when such delays do occur, they are invariably attributable to the failure of the Office of Corporation Counsel to respond quickly to requests for legal assistance in intra-family cases. A greater effort should be made by the Center to document actual waiting times so that problem areas can be identified and corrected.

<sup>3</sup>Although the greater potential for privacy exists because of the extra space, the privacy has not been realized because of delays in partitioning the rooms.

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trained mediators, and less than half (143) resulted in actual hearings. Consequently, the trained mediators were active in dispute resolution in only 7 percent of the complaints lodged. The majority of non-intra-family complaints were set for evening hearings with Assistant U.S. Attorneys (637 set and 337 held), and afternoon hearings with paralegal screeners (234 set and 73 held).<sup>4</sup> Four hundred fourty-five intra-family cases were sent to the Corporation Counsel for civil protection orders. One hundred eighty-six orders were obtained.<sup>5</sup>

The paralegal screeners, who are employed by the U.S. Attorney and supervised by the director of the CCC, have the key position in the flow of non-intra-family cases through the CCC. They alone determine how non-intrafamily complaints will be processed by the CCC. They play a direct and significant part in dispute resolution efforts since they conduct many hearings themselves. They do both of these with substantially no guidance from either the CCC or the U.S. Attorney's Office on dispute resolution techniques or in determining when optional courses of action are preferred.

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After interviewing the complainant, the screeners have four courses of action available to them. If there is substantial injury to the complainant, they can recommend prosecution to the U.S. Attorney's Office. This course is pursued by the screeners only in the most extreme cases. Most often, in the

<sup>&</sup>lt;sup>4</sup>Intra-family offenses must be referred to Social Services or Corporation Counsel unless prosecution is being pursued by the U.S. Attorney's Office.

<sup>&</sup>lt;sup>5</sup>It should be noted that these figures, which were provided by the director of the CCC, do not accounty for approximately 400 cases. It is assumed that these 400 cases were intra-family matters that were handled by the psychiatric social worker.

cases in which the screener believes that prosecution is warranted, she will pursue the second course of action and will set the matter down for an evening hearing with an Assistant U.S. Attorney.<sup>6</sup> The third course is for the screener to set the matter down for an afternoon hearing at which she will preside. This is a new role for the paralegals. This role is allegedly assumed when the paralegals doubt that the Assistant U.S. Attorney will agree to pursue a prosecution, but believe that some action, possibly of a coercive nature, is called for.<sup>7</sup> The paralegal screeners with whom the study team spoke seemed quite confident in their abilities to handle many of these problems. As a consequence, the final course of action, which is also new to the program, referral to the trained mediators, is employed much less frequently than one might have expected.<sup>8</sup>

The pattern of screening decisions of the paralegals could be interpreted as confirming the opinion expressed by Mr. Jim Owens of the U.S. Attorney's Office that most of the people who go through the CCC can best be dealt with by someone from the prosecutor's office (or someone who appears to have the authority of the prosecutor's office) who will "read the riot act" to the offending party and make him understand the gravity of his actions and the

<sup>&</sup>lt;sup>6</sup>The screeners perceive it as being somewhat of a hassle to try to convince the Assistant U.S. Attorneys to pursue prosecutions. Setting the matter down for an evening hearing with the prosecutor allows the problem to be considered more fully by the prosecutor without direct contact by the screener.

<sup>&</sup>lt;sup>7</sup>Because of the large number of cases set for evening hearings with the Assistant U.S. Attorneys, it would appear that those hearings are also used to coerce compliance with the law by the threat of prosecution.

<sup>&</sup>lt;sup>8</sup>One screener said that the guideline which she used for referral to the trained mediators was to send only cases involving children or parties who are so closely related and who have problems of such a complicated nature that lengthy hearings would be required.

jeopardy in which the commission of those acts is placing him. Further study is obviously needed to determine why so few cases are diverted to the trained mediators. Are the trained mediators operating at capacity, so that more referrals are not practical? or are the complaints coming to the CCC generally not suited for mediation? Possibly the screeners do not fully understand the utility of mediation.

## B. <u>Specific</u>

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## 1. <u>Staff Supervision and Training</u>

While staff appear to have high motivation and interest, the burden of the type of work performed, particularly among the more specialized personnel (social workers and screeners), could lead to mental exhaustion and burn-out if the current volume of business is maintained. There seems to be less than optimal supervision and direction by program administrators in respect to this problem and little visible attempt to anticipate staff roles and functions in a rapidly changing organization with increasing community visibility.

The manual provided to staff appears to have little relevance to daily activities and this method for communicating policy seems to have been ignored and does not appear to have been a useful tool for maintaining a standard level of program operations.

Because of the limited supervision exercised by program administrators, it seems that a routine way of handling cases is being established by various staff members which needs to be reexamined and reviewed. It is possible that a party might feel coerced into pursuing a particular course of action if sufficient consideration is not given to the individual nature of each complaint and the unique issues raised in each case.

There also seems to be little if any staff input into the reassessment of effort needed for training and placement activities. In particular, cross

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training and supervision aspects do not appear to have received the attention they need and deserve.

#### 2. Secretarial Staff Needs

There seems to be an extreme shortage of clerical assistance for needed activities such as record keeping, legal document preparation and correspondence. Intake documents are hand-written and stored without regard to the confidential nature of information they contain; storage and filing are not secure. Telephone numbers on cards which the CCC maintains were not accurate and made contact with staff there extremely difficult. An accurate and up-dated list of community resources seems not to have been compiled nor made available to staff and volunteers and greater effort needs to be expended on establishing ties with a variety of community organizations which could render assistance to CCC clients.

#### 3. Volunteer Needs

The lack of volunteers of other than the white race gives some concern. While it is not felt that any of the staff and/or volunteers involved in direct contact with clients are biased in any way, the difficulties of understanding both socio-economic and racial attitudes without a broader racial representation among the volunteers would seem to make it difficult to establish meaningful and needed communication and understanding with the client population.

## 4. <u>Physical Problems</u>

The physical arrangements which exist at the CCC are making it very difficult for both clients and staff to operate efficiently, effectively and without violating basic tenets of privacy. At the time of the consultants' visit, they observed the doubling up of staff and clients in the same rooms, inadequate partitions which caused voices to be heard by different groups in

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the various offices, lack of sufficient chairs and problems stemming from the general traffic flow in the facility. The camera which was used to document physical conditions of complainants had been stolen and not replaced. The facility consultant, Mr. Siegel, attempted to address some of these problems when he reviewed the renovation plans and visited the facility. However, much still remains to be done.

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#### III. RECOMMENDATIONS

## A. <u>Conduct joint meeting of the cooperating agencies to address program needs</u> <u>and problems</u>.

It is felt that at this point in time it would be advisable to set aside one or two days for a retreat with staff and invited members of cooperating agencies such as the U.S. Attorney's Office and the Corporation Counsel's Office to review every phase of program operations with the intent of analyzing the experience accumulated and improving the delivery of CCC services.

In addition, attention should be given to the potential role and function which the CCC could play in the justice system. For example, basic philosophical differences between the prosecuting organizations such as the U.S. Attorney's Office and the Corporation Counsel's Office should be examined in order to avoid any type of chronic operational difficulties that can impact on services to clients. Of particular concern is the fact that the Corporation Counsel's Office is short staffed and believes that many of the complaints coming to the CCC should be dealt with in a non-legal fashion, since inter-personal and family problems are known to be difficult to resolve in a court setting. This attitude contrasts markedly with views expressed by some of the U.S. Attorney's Office which views the CCC as an important training ground for new staff who, through exposure and experience with CCC cases, can develop a greater understanding of problems they will encounter later. Thus, it is essential that all parties concerned sit down outside of the office setting to develop and clarify the goals and objectives of the program. It is hoped that this discussion will eventually help to reduce waiting time and unnecessary run-around for clients and provide more effective and efficient services.

B. Establish goals for the CCC and operational guidelines for its operation.

The goals of the CCC should be established, and operational guidelines for the pursuit of those goals should be developed for both the screeners and mediators.

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Until it is decided what the program is supposed to do or be, resources cannot be effectively allocated, consistency of action is jeopardized, and measuring success is rendered virtually impossible.

## C. Increase efforts to recruit minority volunteers.

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Additionally, the need to recruit more minority volunteers must be emphasized. Considering the difficulty in reaching both Black and Latin volunteers for any purpose, the CCC Director, Noele Brennan, should be congratulated for having been able to recruit some volunteers already. This recruitment effort, however, has to take on the importance it deserves. Consideration should be given to possibly meeting with Rev. Jerry Moore of the 19th Street Baptist Church, Rev. Carlton Veazey of Zion Baptist and Rev. Walter Fauntroy to plan a strategy for the Black sector. Equally important, if slightly less critical, is the need to reach Latin and Spanish speaking volunteers. In this regard, Ayuda, the Latin self-help group on Columbia Road, and representatives of La Raza in the District of Columbia might be approached. Equally feasible would be the recruitment of native Spanish speaking volunteers from dependents of staff members working at the Pan American Union, the Inter-American Defense Center, and the Pan American Health Organization (PAHO).

## D. Provide immediate information to visitors.

It was recommended to the staff during the debriefing that someone ought to be posted in the waiting room at the CCC to provide immediate information to those visiting the center. This individual should be available to explain what the CCC can do, the implications of legal action and, if needed, to make referrals to other community public and/or private agencies to eliminate needless waiting.

A staff person, volunteer or student assigned for field placement, could perform this role. However, the individual must have an ability to assess the specific problem presented and an awareness of resources in the community.

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#### E. Develop a more rapid and ready referral process.

Since the CCC is not only a court referral mediation and screening center, but also, to some extent a social agency, it is viewed as essential that some of the social agency aspects be planned and developed. A ready and rapid referral process must be developed with ad hoc community resources and agencies. There is certainly no need for any duplication of efforts in the community (which already has its share of programs, organizations and projects) but there is need to find out what can be done on a cooperative basis and to ascertain who can provide services at the highest level of efficiency and the lowest level of costs.

F. Conduct further study of the current screening process.

As noted earlier, further study must be done to determine why so few cases are diverted to the trained mediators.

G. Train paralegal screeners in dispute resolution techniques.

The paralegal screeners should be trained in dispute resolution techniques so that more informed screening decisions can be made relative to the most appropriate course of action that should be taken. This is particularly important if they are to continue to serve in the role of mediator.

H. <u>Begin cross-training of staff</u>.

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It is also recommended that there be an attempt at cross-training of staff in order to place less dependence on the skills of certain individual staff members. I. Obtain additional clerical assistance.

There is an absolute need to obtain clerical assistance, either through recruitment of clerical volunteers or by obtaining paid clerical staff. It is suggested that some of the secretarial schools in the D.C. area be approached to provide student clerical assistance and that these schools might take on the responsibility for the staffing of clerical positions at the CCC. If this is not possible, then budget allowances should be made to provide for a full-time paid position essential

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for maintaining records and promoting efficiency. At this time, the Corporation Counsel takes all files to its own office for typing and all orders are typed as there as well.

J. Maintain basic information on each individual seeking CCC services.

To begin a better job of "counting heads" and identifying services performed by the CCC, it is suggested that a five by eight card be maintained for every individual coming to the CCC. Aside from basic identifying information, such as name, address, phone number and the specifics of the complaint, the card would be annotated by individual staff performing any service to the client. This card would be maintained in the office, and information recorded and hand tabulated on a monthly basis. Client returns, or new complaints, would be noted in much the same manner as is done by medical personnel for medical history, billing and routing purposes. This information would provide an indication of the volume and type of complaints received by the CCC as well as provide more accurate and sensitive data to guide the administrators regarding improvements or changes in service components.

In developing the record system, effort should be made to document actual waiting times so that problem areas in this regard can be identified and corrected.

#### K. Plan for evaluation needs.

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Like any other organization in the process of change, there has to be a reexamination that is constant of the goals and objectives of the Citizens' Complaint Center as well as of the methods used to attain these goals. The staff's functions and the staff's role also must be re-examined periodically and the agency's perspective must, by necessity, include the needs and requirements of cooperating groups -- in particular the U.S. Attorney's Office and the Corporation Counsel. Other evaluation needs must be integrated into the total evaluation design for the District of Columbia Court system developed by the SPA and must produce management information that is compatible with other information derived from criminal justice agencies. Only then, can this information be used for policy relevant decisions and to better evaluate stated goals and objectives and mesh those with the needs as perceived by the community.

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#### IV. SUMMARY

Considering basic limitations, it is felt that the CCC is doing a creditable job and is taking seriously the recommendations of the 1976 study. Much, however, needs still to be done. In particular, relations with the courts and the community need to be strengthened, misunderstandings cleared up and fences mended.

The CCC is rendering needed assistance to a large segment of the population and its services will be in greater demand in the future. Considering the limitations both in terms of personnel and budget, the Citizen's Complaint Center is doing an effective and meaningful job. Many, if not all, of the problems that have been mentioned in this report can be solved, or certainly minimized if some attention is paid to the solutions. Time must be made available for a review, for staff input and a redesign of the focus and the services that can be provided. This ought to take place away from the office and it ought to take place soon.

Future research and evaluation needs should be planned carefully to provide not only statistical information but feedback for improving operations and services. This retrieval process need not be expensive or sophisticated, but would categorize the varying aspects of the program. The Offices of the U.S. Attorney and the Corporation Counsel must be included in the design so that there is compatibility in data results and not become the cause of problems in communication in the future.

The CCC Director should receive periodic assistance in program development, staff training and supervision and basic management techniques on a specific time schedule; she should not have to wait until a crisis situation develops to tackle a specific problem. So far she is receiving the support and good will of persons who are critical to the survival of the center. This support, however, is conditioned by the need for trouble free and efficient activities. The staff of the Citi~ zen's Complaint Center can provide this, but only if its own needs are taken into

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consideration and are kept involved in the planning and in establishing its enlargement of responsibilities.

A periodic review of the Center's activities by a team of experts experienced with programs of this type will help in maintaining the focus of the program and in avoiding needless problems in the future.

In sum, the services provided by the Citizens' Complaint Center are important ones that have drastically improved since 1976. Immediate attention, however, must be given to refining the goals of the program so that its direction can be more focused, and its services, correspondingly, improved still further. Although the CCC has the potential for providing significant contributions to the District of Columbia, that potential may only be realized if its limitations are initially understood, and its goals, direction, and services are structured accordingly.

#### APPENDIX

#### PUBLICATIONS AND DOCUMENTS REVIEWED

- 1. A Review of the D.C. Citizen's Complaint Center, The American University, Criminal Courts Technical Assistance Project, 1976.
- Grant Award. Revised Budget, July 1978, Office of Criminal Justice Plans and Analysis #78-12-08, Citizen's Complaint Center.
- Grant Award, Revised Budget, August 1979. Office of Criminal Justice Plans and Analysis, #79-12-05, Citizen's Complaint Center.
- Evaluation of Screening Criteria Used at Citizen's Complaint Center, Washington, D.C. INSLAW, March 1977.
- 5. Study of the D.C. Intra Family Statute, The Woman's Rights Clinic, Antioch School of Law, December 1979.
- 6. Quarterly Reports: October 78 December 78, April 1979, June 1979.
- 7. U.S. Attorney's Office Follow-up Report, December 1979.
- 8. Course Outline for Community Mediation Training, December 1979.
- 9. Volunteer Training Manual, March 1979.

- 10. Draft of Guidelines for Processing Assorted Complaints at the Citizen's Complaint Center, Washington, D.C. Undated.
- 11. Draft Guidelines, D.C. Corporation Counsel. Re Intra Family Offenses. Undated.

