

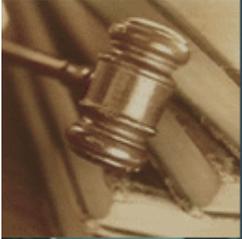
Elder Abuse: An Overview for the CA Courts

Candace J. Heisler

© Candace J. Heisler, 2007



ADMINISTRATIVE OFFICE
OF THE COURTS



This curriculum was developed under grant No. 06-02-38 from the Archstone Foundation. The opinions, findings, and conclusions in this publication are those of the author and do not necessarily represent those of the Archstone Foundation.



ADMINISTRATIVE OFFICE
OF THE COURTS

Why Is Elder Abuse an Issue for the California Courts?

What are you seeing in
your courts?



ADMINISTRATIVE OFFICE
OF THE COURTS

Aging in the U.S.

- The United States is Aging...
 - By 2030, there will be more persons over 65 than under the age of 18
 - By 2030, 70 million seniors, more than twice their number in 1990
 - In 2000, elderly were 13% of population; in 2030, elderly will be 20%



California's Aging Population

- California has the largest elderly population in US--nearly 4 million
- Growing by nearly 200,000 per year
- Elderly Population will grow 101% in the next 20 years
 - By 2020, there will be 6.6 million elderly in California
 - Nearly 1 million will be at least 85 (151% increase)



What Is Elder Abuse?

- “Intentional actions that cause harm or create serious risk of harm, whether or not intended,
- To a vulnerable elder by a caregiver or other person who stands in a position of trust to the elder, or failure by a caregiver to satisfy the elder’s basic needs or to protect the elder from harm.”
 - Bonnie and Wallace (2003)
- Conduct may or may not be criminal



Limitations of This Definition

- Excludes abuse by strangers
- Excludes most frauds and scams
- Excludes self neglect



Self Neglect

- Seen in various legal contexts
 - Hoarding and animal collecting
 - Code enforcement matters
 - Conservatorship
 - Largest category of cases referred to APS



Self Neglect

- May be outcome of earlier victimization
 - Dyer, 2006
- Not elder abuse as no third party abuser
- Complex legal issues
 - Capacity or dementia
 - Executive functioning
 - See Journal of Elder Abuse and Neglect (2007) 18(4), Haworth Press—issue devoted to self neglect.



Penal Code 368

- “Elder” is a person 65 years or older
- “Dependent Adult” is a person 18-64
 - Who has mental or physical limitations
 - Restricting his or her ability to carry out normal activities or protect one’s rights
 - Includes but not limited to persons with physical or developmental disabilities; or
 - Physical or mental abilities have diminished due to age



Relevant Code Sections

- Probate Code Section 2100 et seq. – Appointment of Conservator or Guardian
- Probate Code Section 2900 et seq. – Public Guardian authority to take temporary possession or control of property





Relevant Code Sections

- Welfare and Institutions Code 15600 et seq. (Elder Abuse Reporting Law)
 - Physical abuse, neglect, financial abuse, abandonment, isolation, abduction, or other treatment with resulting physical harm or pain or mental suffering
 - Deprivation by a care custodian of goods and services necessary to avoid physical harm or mental suffering



Relevant Code Sections

- Welfare and Institutions Code 15657 et seq. (Elder Abuse Protective Orders)
- Penal Code 368
 - Physical abuse, neglect by a caretaker, unjustified physical pain or mental suffering, financial exploitation, false imprisonment of person over 65 or dependent adult



Incidence and Prevalence of Elder Abuse

- Actual numbers unknown
- Approximately 2 million Americans 65 and older are victims of abuse and mistreatment by someone on whom they depend for care or protection
 - Bonnie and Wallace (2003)
- Studies have found prevalence rates for annual elder abuse between 2 and 32%
 - See Desmarais and Reeves, 2007 for review of studies





Incidence of Elder Abuse

- Severely underreported
 - 1 in 5 or 1 in 14
 - National Center on Elder Abuse, 1998; Pillemer & Finkelhor, 1988; Rennison & Rand, 2003
- Most occurs in the community not in facilities
- Small percentage in court settings





California Abuse Statistics

- APS handles more than 225,000 cases a year
- Elder abuse reports received increased from 53,000+ in 2000 to 65,000+ in 2005
- Evidence of a steady increase in EA-100 petitions filed since FY 2001-02





Why Is Elder Abuse So Underreported?



ADMINISTRATIVE OFFICE
OF THE COURTS

What Courts Handle Elder Abuse Cases?

In What Types of Proceedings Are Elder Abuse Matters Heard?



ADMINISTRATIVE OFFICE
OF THE COURTS

Elder Abuse

- Present in Virtually Any Court
 - Criminal
 - Civil
 - Family
 - Probate
 - Juvenile
 - Traffic
- May not be identified as elder abuse



Judicial Involvement in Elder Abuse Matters

- Criminal Cases
- Civil Fraud and Conversion
- Domestic Violence
- Personal Injury
- Unlawful Detainer
- Lawsuits against Facilities
- Adult Adoptions
- Probate
- Conservatorship
- Mental Health Commitment
- APS Initiated Proceedings
- Domestic Relations
- Cases Regarding Health Care Decisions For Incapacitated Person
- Civil Harassment



ADMINISTRATIVE OFFICE
OF THE COURTS

Do Courts Know When a Case Is Elder Abuse?

What can courts do to
identify cases of elder
abuse?



ADMINISTRATIVE OFFICE
OF THE COURTS

Video

- “I’d Rather Be Home” (Norman)
 - What types of abuse are present?
 - Is this domestic violence?
 - What courts might be involved in Norman’s case?



Forms of Abuse

- Often more than one form is present
 - (Brandl et al., 2007; Heisler, 2007)
- One form may be the method to achieve a desired outcome
 - Abuse or neglect to convince an elder to give up assets
 - Always consider if financial present



Forms of Abuse

- Psychological is usually present
- Often long standing dynamics that have existed throughout the relationship
 - Organic or age-related psychopathology the exception. See Desmarais and Reeves, 2007



Forms of Elder Abuse

- Physical abuse
 - Includes Domestic violence
- Sexual abuse
- Neglect by a care provider
- Emotional or psychological abuse
- Abandonment
- Abduction
- Financial exploitation



Profile of the Perpetrator

- Family member (usually male)
- Generational abuse (domestic violence)
- Substance abuse
- Dependence on the victim
- Mental health problems
- Enmeshed bizarre sexual relationship with mother (elder sexual assault)



Perpetrators

- Some are sexual predators (Burgess, Dowdell, & Brown, 2000; Heisler, 2001)
 - Nursing home staff
 - Persons seeking safe contact with persons who are vulnerable
 - Grooming behaviors
 - Not likely to be reported; if reported victim is unlikely to be believed
- Some are con artists and career criminals
 - Scams and frauds
 - Target elders because of perceived mental and physical vulnerabilities



Victims

- No single profile
- Abilities along a continuum
 - Some highly dependent on others for care; others are not
- Women victimized more often than men
 - 72% of physical abuse victims reported to APS are women (NCEA, 1998)
- Social and other isolation
- Cannot recoup losses
- Hesitant to use social service system



Victims of one form of elder abuse are at highest risk for other forms of abuse.



ADMINISTRATIVE OFFICE
OF THE COURTS

What Are Common Victim Reactions to Elder Abuse?



ADMINISTRATIVE OFFICE
OF THE COURTS

Common Victim Reactions

- Denial
 - Not see themselves as abused or admit it
- Feel responsible
- Feel guilt and shame
- Fear loss of independence and abandonment
- Resigned
 - May be dependent on abuser for care and companionship or be caregiver for abuser
 - Unaware of APS and protective services
- Situation is magnified for non-English speakers
 - Lack of access to help due to cultural or language differences



Common Victim Reactions

- Fear involving outsiders will result in nursing home placement
- Fear outsider interventions will not protect them
- Fear of legal system to fairly resolve matter





How Do These Reactions Affect the Justice System?



ADMINISTRATIVE OFFICE
OF THE COURTS

Victim Behavior and Impact on the Judicial System

- Reluctance to “press charges” and
 - Get family members in trouble
 - Shame at having situation made public
- Not attend or testify
 - Lack of transportation to court
 - A caregiver for an ill family member
- Fear of testifying and court process
 - Lack of information about court system and legal rights and remedies



Impact of Elder Abuse

- Earlier morbidity
- Devastating medical impact
 - Declining functional abilities, progressive dependency, a sense of helplessness, social isolation, and a cycle of worsening stress and psychological decline
- Risk of death three times higher than for non victims" (Dong, 2005)



Impact of Financial Exploitation

- Impact can be as profound as violent crime (Deem, 2000) or physical abuse (Dessin, 2000).
- Unable to rebuild financial assets or recoup losses
 - Loss of independence and security
 - Dependency on family,
 - Reliance on public assistance and social welfare programs,



Domestic Violence in Later Life

- Elements of elder abuse and domestic violence
- “Power and control”
- Most victims are women
- Some different tactics compared to domestic violence among younger adults



Domestic Violence in Later Life

- Abuse that occurs in an ongoing relationship for which there is an expectation of trust
 - Includes more than intimate partners
 - May include relationships not included in various domestic violence statutes



Close Relationship Between Elder Abuse and Domestic Violence

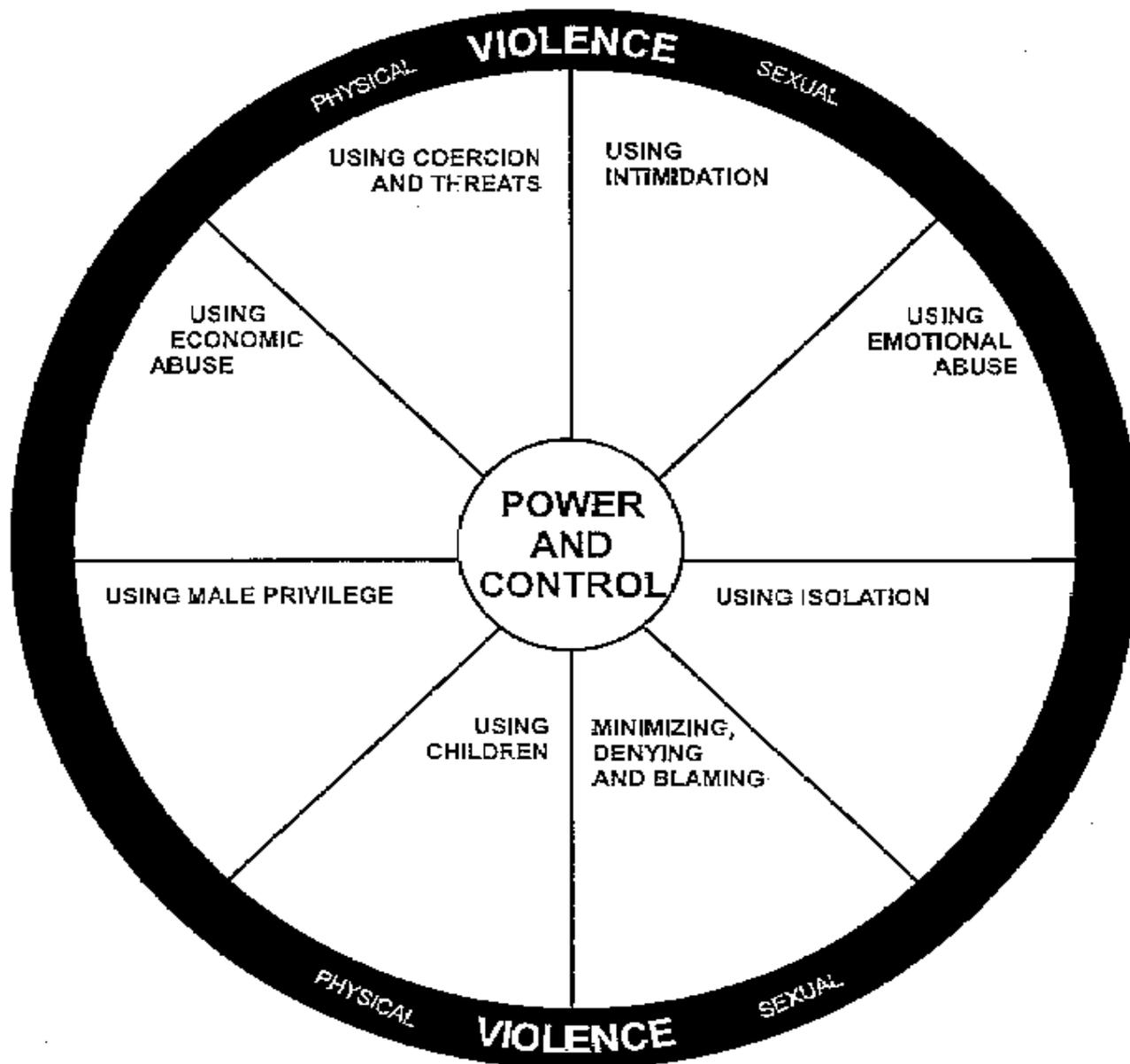
**Elder
Abuse**

**Elder
Domestic
Violence**

**Domestic
Violence**



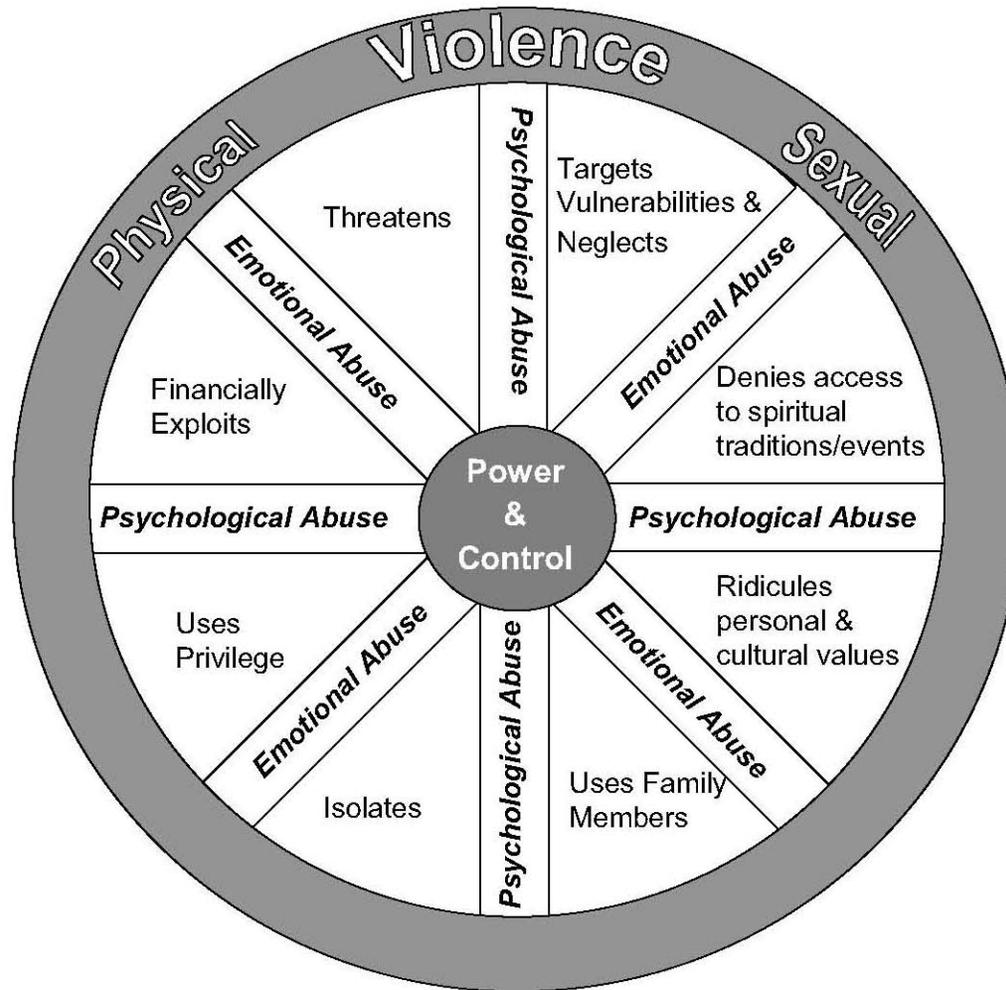
ADMINISTRATIVE OFFICE
OF THE COURTS



Abusive Relationship

Provided by Duluth Domestic Abuse Intervention Project

Abuse in Later Life Wheel



Created by the National Clearinghouse on Abuse in Later Life (NCALL), a project of the Wisconsin Coalition Against Domestic Violence (WCADV).
 307 S. Paterson St., Suite 1, Madison, WI 53703(608) 255-0539 / FAX:(608) 255-3560

This diagram adapted from the Power and Control/Equality wheels developed by the Domestic Abuse Intervention Project, Duluth, MN

What About Caregiver Stress?

- Early theory of elder abuse
- Assumes a well-intending, normally competent caregiver
- Becomes overwhelmed and lashes out
- High stress and low resources results in maltreatment



Limitations of Caregiver Stress

- Not supported by more recent research (pointing to domestic violence)
- Identifies the victim as the “problem”
- Abuser feels validated
- Leaves victim in harm’s way
- Victim may become hopeless



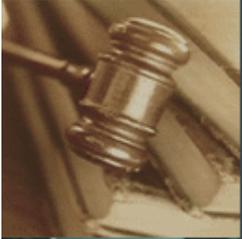
Elder Homicide-Suicide

- New research area led by Dr. Donna Cohen
- Key research at University of South Florida has examined homicide-suicide cases since 1988
- About 1500 cases annually in US
- **83% involve spouses and intimate partners**
- Perpetrator is always the male partner
- Guns used more than 90% of the time
 - In domestic violence situations victims were shot or stabbed multiple times



Elder Homicide-Suicide Data

- One third of all cases include a history of domestic violence
- All involve a perpetrator determined to maintain the relationship when threatened with separation or dissolution
- High incidence of untreated and undetected psychiatric problems, especially depression



Elder Homicide-Suicide Data

- Why is this important to the court?
 - Help evaluate potential lethality of a situation
 - When the court can have mental health assessed, it may be better informed when sentencing, deciding pretrial release issues, considering placement, and removing an elder from their residence
 - Ordering mental health treatment may reduce danger in some cases



Undue Influence

- Power and control
- Exploit trust, dependency and fear of another
- Purpose: deceptively gain decision making control
 - People v. Brock (2006) 143 Cal. App. 4th 1266

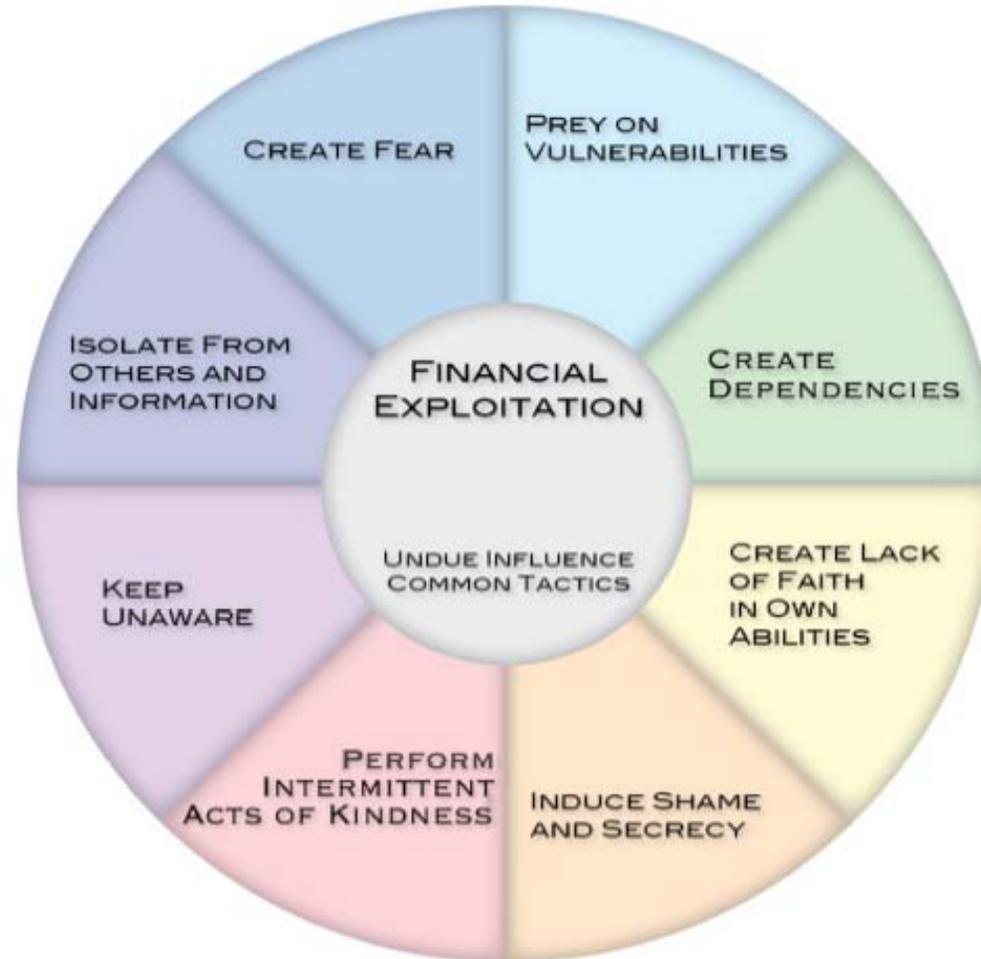


Undue Influence

- More than persuasion or salesmanship
- Pattern of tactics
- Brainwashing – cults, hostages, POWs
- Criminal and civil aspects
 - Method to commit a crime, gain a benefit
- Behaviors similar to domestic violence, stalking, and grooming (Brandl, Heisler, & Stiegel, 2006)



Undue Influence Tactics



COPYRIGHT © 2006 YWCA OMAHA, NEBRASKA



ADMINISTRATIVE OFFICE
OF THE COURTS





How Can You Use This Information in Judicial Decision Making?



ADMINISTRATIVE OFFICE
OF THE COURTS

Forensic Issues

- Identifying abuse and neglect
 - Lack of geriatric teams, centers, and experts
- Determining competency to testify
 - Lack of consistent legal standards
 - Difficulty obtaining a mental health assessment
 - Competency is not the same as capacity



Dementia, Delirium, Depression

- Dementia is progressive, irreversible, incurable
- Risk factor for abuse
- Most common form is Alzheimer's
- Person with earlier phases of dementia can recall, testify, state their desires
- Persons in late stages may lose ability to control behavior and become combative



Dementia, Delirium, Depression

- Delirium is reversible and treatable
 - Urinary tract infection and other illness
 - Medication
 - Dehydration and malnutrition
 - May require a temporary court intervention
 - With treatment person will return to prior capacity level
 - Can be confused with dementia



Dementia, Delirium, Depression

- Depression
 - Treatable
 - May be associated with grief and loss
 - Risk factor for suicide-homicide
 - Importance of assessment



Importance to Court

- If condition is treatable (delirium and depression)
 - Court may only need a short term intervention
 - Importance of frequent monitoring for improvement
 - Value of review hearings to determine if court intervention continues to be needed
- Dementia can co-exist with delirium and depression
 - With treatment will improve to person's highest level of functioning
 - Court may be able to modify orders to address increased and then decreased capacity and abilities as disease progresses



Medical Complexities

- Critical role of the medical professional
 - Expert must understand geriatrics
 - Delirium and dementia can be confused
 - Untreated mental health conditions especially depression
 - Opportunity for court to intervene
 - Often need a mental health assessment before case is adjudicated



Elder Abuse Complexities

- What may look like abuse may not be
 - ❑ Competent medical care may look like abuse
 - ❑ Disease processes may look like abuse
 - ❑ Elderly may bruise more easily than younger adults
 - ❑ Some medications may cause skin breakdown



Outside Systems

- Adult Protective Services (APS)
- Public Guardian
- Long Term Care Ombudsman Program
 - Patient advocate for facilities
 - Often volunteers
 - Must have client permission to report abuse unless personally witness it
- "Aging Services"
 - Network of services and agencies in a variety of disciplines
 - Vary across communities
 - APS is usually the gateway



Adult Protective Services

- Offer services to consenting elders
- Can involve Public Guardian to seek court involvement, mandatory placement, appointment of decision maker for person without capacity
- Services: Crisis intervention, assessment, service plans, linkages with other services including geriatric mental health, short term case management, and arranging for monitoring
- Not like Child Protective Services



ADMINISTRATIVE OFFICE
OF THE COURTS

Court Responses

- Case Setting Priority
- Direct Calendaring of Matters
- Resist Unnecessary Continuances
- Scheduling Flexibility that Considers Elder's
 - Need for medication and meals
 - Fluctuating mental alertness
- Encourage victims to provide impact statements at sentencing



Court Responses

- Alternative Methods for Obtaining and Preserving Testimony
 - Deposition
 - Conditional examination (PC 1335-1345)
 - Videotaped bedside testimony
 - Real time testimony using court reporter for older party or witness
 - Telephonic/videoconferencing of court appearance



Dependent Person

- Dependent Person (Evidence Code 177)
 - Any age with physical or mental impairment
 - Substantially restricts ability to carry out normal activities or protect legal rights
- Special procedures
 - Courtroom procedures
 - Jury instructions (Penal Code 1127g)



Procedures to Assist Victims and Witnesses Who Have Disabilities

- Tell truth vs. formal oath
- Reconfigure courtroom
- Frequent breaks
- Time of giving testimony
- Court responsibility to protect witness
- Support persons at grand jury and court
 - Evidence Code 177 and 868.8



Accessing Witness Credibility

- Jury Instruction to assist jury in assessing testimony of a person with a developmental disability, or cognitive, mental, or communication impairment
- Upon request of a party in a criminal case
- Court shall instruct
- California Penal Code 1127g



Right to Support Person and Advocate

- At formal interview by law enforcement, prosecutors and defense (PC 679.04)
- At forensic examination (PC 264.02)
- Grand jury (PC 939.21)
- In court – up to 2 support persons at preliminary hearing and trial (PC 868.5)
- Juvenile court hearing- up to 2 support persons (PC 868.5)



Special Procedures in Court

- See Handout for procedures and recent relevant legislation



ADMINISTRATIVE OFFICE
OF THE COURTS

Court Responses

- Protect the Abused Party
 - If appropriate, has the abused person been encouraged or helped to prepare a safety plan?
 - Should a restraining order or no-contact order be issued?
 - Special terms such as enjoining threats, stalking, harassment needed?
 - If appropriate and permitted by law, should the court order surrender of firearms and other weapons?



Court Responses

- If Victim Wants To Continue the Relationship with the Abuser, and It Can Be Done Safely
 - Should counseling or treatment be ordered?
 - When might joint counseling be appropriate?
 - What kind(s) of counseling or treatment is needed?
 - Is visitation appropriate?
 - Any conditions needed? Supervised?



Court Responses

- Linking the Abused Person to Services
 - Should APS be contacted?
 - Are services available from the local aging services network? Appropriate?
 - Are services available from the local domestic violence, sexual assault, or victim assistance program? Appropriate?
 - Refer to self-represented litigant assistance programs?
 - Other helpful local services available?



Court Responses

- Need to Protect Others From the Abuser?
 - Other family
 - Persons and groups providing assistance to abused persons (conservator, caregiver, etc.)
- Is the abuser a threat to the public at large?





Court Responses

- What Can the Court Do to Make the Victim Whole?
 - Restitution and return of property
 - Does the abuser have assets that can be attached or wages that can be garnished?

Court can monitor the case

- Schedule Compliance Reviews
- Apply Case Management Principles
- Assure that payment is made and continuing
- Assure compliance with counseling or treatment
- Assure restraining order compliance





**Restitution is one of the
most significant factors
affecting victim
satisfaction with criminal
justice process**

***New Directions from the Field*
(1998)**



ADMINISTRATIVE OFFICE
OF THE COURTS

Court Initiatives

- Fatality Review Teams
 - Hawaii Judicial Model
- Elder Abuse Court or Court Calendar
 - Alameda County
 - Case management
- Elder Justice Court Staff
 - Florida



Court Initiatives

- Court Review to Assure Abuser Accountability
 - Domestic Violence and Drug Court models
 - Escalating Sanctions
 - Frequent reviews, especially at the beginning
 - Review perpetrator's employment (elder care?)
 - Access to firearms considered?



Court Innovations

- Recruit volunteers to assist elderly litigants
 - Locating courtrooms and offices
 - Assist in completing court forms and applications
 - Assist in reading court materials
 - Court accompaniment and support
 - Referral to or linkage with legal assistance, community services, domestic violence and sexual assault programs, and victim witness assistance programs



Court Innovations

- Develop CASA-like program for elderly
- Build accessible courtrooms and court houses
 - Required by ADA
 - Eleazor Courtroom, Stetson University,
www.law.stetson.edu/Eleazercourtroom



ADMINISTRATIVE OFFICE
OF THE COURTS



"The moral test of government is how it treats those who are in the dawn of life, the children; those who are in the twilight of life, the aged; and those in the shadows of life, the sick, the needy and the handicapped."

- Senator Hubert Humphrey



ADMINISTRATIVE OFFICE
OF THE COURTS

Resources

- National Center on Elder Abuse
 - www.ncea.aoa.gov
- National Clearinghouse on Abuse in Late Life
 - www.ncall.us
- National Center on State Courts
 - www.ncsc.org
- Stiegel, L. (1996) *Recommended Guidelines for State Courts Handling Cases Involving Elder Abuse*. Washington, DC: American Bar Association



Sources

- Appel, A.E. and Holden, G.W. (1998) "The Co-Occurrence of Spouse and Physical Child Abuse: A Review and Appraisal," Journal of Family Psychology, 12(4), 578-599.
- Bonnie, R.J., & Wallace, R.B. (Eds.), Panel to Review Risk and Prevalence of Elder Abuse and Neglect. Committee on National Statistics and Committee on Law and Justice, Division of Behavioral and Social Sciences and Education National Research Council (2003). Elder Mistreatment: Abuse, Neglect, and Exploitation in an Aging America. Washington, DC: The National Academies Press.
- Bonomi, A.E., Anderson, M.L., Reid, R.J., Carrell, D., Fishman, P.A., Rivara, F.P., Thompson, R.S. (2007) "Intimate Partner Violence in Older Women," The Gerontologist, 47(1), 34-41.
- Bozinovski found an overlap between self neglect and previous family violence victimization, relationship failures, abandonment by family members, betrayal, poor relationship with parents, and family estrangement (Bozinovski, S. D. (1995). Self-neglect Among The Elderly: Maintaining Continuity Of Self. Unpublished doctoral dissertation. University of Denver, Colorado; 1995.
- Brandl, B., Heisler, C., & Stiegel, L. (2006) " The Parallels Between Undue Influence, Domestic Violence, Stalking, and Sexual Assault," Journal of Elder Abuse & Neglect, 17(3), 37-52.



Sources

- Brandl, B., Dyer, C. B., Heisler, C. J., Otto, J. M., Stiegel, L. A., & Thomas, R. W. (2007). Elder Abuse Detection And Intervention: A Collaborative Approach. New York: Springer., p. 50.
- Burgess, A., Dowdell, E., & Brown, K. (2000) "The Elderly Rape Victim: Stereotypes, Perpetrators, And Implications For Practice," Journal of emergency Nursing, 26(5), 516–518.
- Cohen, D. (1998). Homicide-Suicide in Older Persons," American Journal of Psychiatry, 155, 390–396; Cohen, D. (2000), " An Update on Homicide-Suicide in Older Persons: 1995–2000," Journal of Mental Health and Aging, 6(3), 195–197; Malphurs, J. E., & Cohen, D. (2001) " A State-wide Case Control Study of Spousal Homicide-Suicide in Older Persons," American Journal of Geriatric Psychiatry, 9(1), 49–57.
- Deem, D. (2000) " Notes from the Field: Observations in Working with the Forgotten Victims of Personal Financial Crimes," Journal of Elder Abuse & Neglect, 12(2), 33–48.
- Dessin, D. L. (2000) "Financial Abuse of the Elderly," Idaho Law Review, 36, 203–226.
- Dong, X. (2005) " Medical Implications of Elder Abuse and Neglect," in (M. J. Gorbien, Ed.). Clinics in Geriatric Medicine, 21(2), 293–313.



Sources

- Dyer, C. B., Connolly, M. T., & McFeeley, P. (2003) "The Clinical And Medical Forensics Of Elder Abuse And Neglect," in R. J. Bonnie & R. B. Wallace (Eds.), Elder Mistreatment: Abuse Neglect And Exploitation In An Aging America (pp. 339–381). Washington, DC: National Academies Press.
- Dyer, C. B. (2006). Self-neglect Can Be Hazardous To Your Health. Unpublished manuscript.
- Desmarais, S.L. and Reeves, K.A. (2007) "Gray, Black and Blue: The State of Research and Intervention for Intimate Partner Abuse Among Elders," *Behavioral Sciences and the Law*, 25, 377-391, 382, 394-385. John Wiley & Sons, Ltd.
- Fisher, B.S., Regan, S.L. (2006) "The Extent and Frequency of Abuse in the Lives of Older Women and Their Relationship With Health Outcomes," *The Gerontologist*, 46(2), 200-209.
- Gorbien, M. (2005) " Preface," Clinics in Geriatric Medicine, 21(2), 279; Administration on Aging (2004) A Profile of Older Americans: 2004, Washington, DC: U.S. Department of Health and Human Services.
- Heisler, C. J. (2001) "Elder Sexual Assault," In California District Attorney's Association, Investigation And Prosecution Of Sexual Assault, (Chap. 9). Sacramento, CA: California District Attorney's Association.



Sources

- Heisler, C.J. (2007) "Elder Abuse," in Davis, R.C., Lurigio, A.J., and Herman, S. Eds. Victims of Crime, 3d Ed., Sage Publications.
- Hughes, H.M., Humphrey, N.H., and Weaver, T.L. (2005) "Advances in Violence and Trauma: Toward Comprehensive Ecological Models," Journal of Interpersonal Violence, 20(1), 31-38.
- Lachs, M. S., Williams, C. S., O'Brien, S., Pillemer, K. A., & Charlson, M. E. (1998) "The Mortality Of Elder Mistreatment," Journal of the American Medical Association, 280, 428-432.
- National Center on Elder Abuse (1998) The National Elder Abuse Incidence Study: Final Report. Washington DC: Administration on Aging.
- Pillemer, K., and Finkelhor, D. (1988) "The Prevalence of Elder Abuse: A Random Sample Survey," Gerontologist, 28, 51-57.
- Rennison, C. and Ran, M. (2003) "Non-lethal Intimate Partner Violence: Women Aged 55 or Older," Violence Against Women, 9, 1417-1428.
- Straka, S.M., Montminy, L. (2006) "Responding to the Needs of Older Women Experiencing Domestic Violence," Violence Against Women, 12(3), 251-267, Sage Publications.



Sources

- Walsh, C.A., Ploeg, J., Lohfeld, L., Horne, J., MacMillan, H., and Lai, D. (2007) "Violence Against the Lifespan: Interconnections Among Forms of Abuse as described by Marginalized Canadian Elders and their Care-givers," British Journal of Social Work, 37, 491-514, Oxford University Press.
- Wolf, R. S. (2000, Summer) "The Nature and Scope of Elder Abuse," Generations, 29(14), 6-12.



ADMINISTRATIVE OFFICE
OF THE COURTS