



## New Cases in 2019 Affecting Survivors of Domestic Violence

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# Technical Difficulties

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- Audio Difficulties:
  - ▣ Hang up the phone and call back using your initial call in information
- Zoom Program Malfunction
  - ▣ Close down the program and log back on

# Agenda

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- California Appellate Cases & Process
- Restraining Orders
- Custody and Visitation
- Criminal Law
- Immigration/Other

# FVAP is

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- A non-profit organization dedicated to providing legal representation and support to domestic violence survivors at the appellate court level.
- Partners with pro bono attorneys from private firms to provide free, high-quality legal representation to low- and moderate-income survivors
- Provides technical assistance to pro bono attorneys, domestic violence advocates on domestic violence issues arising in family law, housing and employment cases

# California Appeals

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## Appellate Cases & Process



# What does the trial court do?

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- Trial courts:
  - ▣ Make decisions as to the facts and makes orders on requests based on applying the law (code sections, rules, case law) applies to those facts and issue orders
- The trial court judge/commissioner/judge pro tem:
  - ▣ Holds hearings
  - ▣ Reviews filings from both sides
  - ▣ Observes witnesses testifying (credibility)
  - ▣ Looks at physical evidence (documents etc)
  - ▣ Makes findings of fact as to what happened



# What does the appellate court do?

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## Appellate **courts** (“COA”):

Look at happened at the trial court based on the record in the case, apply the law and determine:

- Was there any legal error?
- Was there an “abuse of discretion”?
- Was there prejudice?
- If yes, then the court can reverse/send back

- The appellate court justices operate as a panel and generally review only what is in the record of the case, i.e., transcripts, admitted evidence, and court filings.

# Appeals in California

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- 360,387 total family law cases were filed at trial court including marital cases and other petitions in 2017-18\*
- The average appeal took 577 days with a range of 410-967 days\*

\* Statistics are for 2017-18 from 2019 Statewide Caseload Trends 2008-9 to 2017-18, Judicial Council of California, 2019, available at [www.courts.ca.gov/12941.htm#id7495](http://www.courts.ca.gov/12941.htm#id7495)

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# Family Law Appeals in California

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- Family law parties in court:
  - ▣ Are not provided with a lawyer either at the trial or appellate stage
  - ▣ Are primarily unrepresented and lack the resources to file an appeal
- Family law trial court cases are difficult to appeal because:
  - ▣ Many orders are temporary and not directly appealable
  - ▣ The case is often continuing while the appeal is in process
  - ▣ The length of time to get results can mean the results are not as helpful by the time of a decision

# Why are published appellate cases important?

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- In California, most appellate decisions are not published, so cannot be cited in other cases – they apply only to the original parties
- When appellate decisions are published, they are part of the body of law that CA attorneys and judges must follow, the decision is case law
- Many appellate decisions interpret statutes and apply law to new situations which gives guidance to trial courts and parties in the future

# RESTRAINING ORDERS

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N.T. v. H.T.

Lugo v. Corona

Molinaro v. Molinaro

Marriage of Ankola

Marriage of Goodwin-  
Mitchell & Mitchell

Tanguilig v. Valdez

Herriott v. Herriott



# N.T. v. H.T. - Overview

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- 34 Cal.App.5th 595 (2019), 4th Dist., Div. 3 Orange County
- N.T. and H.T were married with 7 month old child in common
- N.T. (Wife) had a 3 year old from a prior relationship
- Wife obtained Temporary RO protecting herself and both kids
- After 5 months, parties agreed to extend TRO for 3 more months and have a visitation schedule for child in common

# N.T. v. H.T. – Key Facts

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- H.T.'s (Husband) behavior at exchanges included:
  - ▣ Refusing to give child to Wife unless she would talk to him about their relationship
  - ▣ Following Wife, and asking why she would not stay and talk
  - ▣ Coming to location near the exchange early and took the child
  - ▣ Giving Wife a letter at an exchange which said that she was “dirty” and needed to be “cleansed”.

# N.T. v. H.T. - Procedure

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- Request for Order: Wife requested a DVRO based on Husband's violations of TRO, Husband admitted to many of the allegations
- Trial Court Ruling: Denied request, said incidents were not DV, would only be DV if violating a TRO is DV; Even if it were they were "technical violations" of the TRO
- Appellant: Wife appealed denial of the DVRO



# N.T. v. H.T. - Holding

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- A knowing violation cannot be "de minimus" and Husband's actions were not "technical violations"
- Husband's actions were obvious breaches of Wife's peace and justified issuing a DVRO on its own
- Even without the TRO, the behaviors would have been acts of abuse



# Lugo v. Corona - Overview

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- 35 Cal.App.5th 865 (2019), 2nd Dist., Div. 4, Los Angeles County
- Lugo (“Wife”) and Corona (“Husband”) are married
- Two children in common, ages 6 and 10. Lugo has another minor child 17 who lives with them
- No custody orders in place

# Lugo v. Corona – Key Facts

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- The parties had a physical fight and at one point Wife slapped Husband
- Husband then grabbed her by neck, pushed her down on sofa, strangled her, repeatedly threatened to strangle and kill her
- One child was asleep in the room when it happened and another child was in a nearby bedroom
- Husband pleaded no contest to spousal battery and a Criminal Protective Order (“CPO”) was issued protecting Wife

# Lugo v. Corona – Procedure

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- Request for Order: Wife requested a Domestic Violence Restraining Order (“DVRO”) in Family Court including custody and visitation orders
- Trial Court Ruling: Temporary Restraining Order (“TRO”) was denied, at hearing Court said it saw no reason to make order because the CPO in place took priority
- Appellant: Wife appealed

# Lugo v. Corona – COA Holding

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- CPOs and DVROs can co-exist and issuing one does not prevent the other
- DV family court remedies are provided are in addition to any other civil and criminal remedies available to petitioner
- Legislature's view is that all courts use all available tools to safeguard victims of domestic violence

# Molinaro v. Molinaro - Overview

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- 33 Cal.App.5th 824 (2019), 2nd Dist., Div. 3, Los Angeles County
- Husband and Wife were married and had two children in common, age 13 and 17
- Wife filed for dissolution
- Husband had been arrested for preventing Wife from leaving



# Molinaro v. Molinaro – Key Facts

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- Wife said that Husband was posting derogatory comments on social media including that Wife was crazy, hallucinating, had stolen money
- Wife alleged that Husband had posted photo and address of new residence after she tried to keep it confidential
- Husband gave copies of Wife's DVRO request to the children
- Daughter had testified that her Father had threatened to put their dog to sleep

# Molinaro v. Molinaro - Procedure

22

- Request for Order: Wife requested DVRO, including custody orders; the TRO was denied. Both parties were ordered “not to post anything about the case on Facebook” and “not to discuss the case with the children.”
- Trial Court Ruling: DVRO granted, included an order that Husband not post anything about the dissolution action on Facebook
- Appellant: Husband appealed. One argument he made was that the order about posting violated his 1st Amendment rights

# Molinaro v. Molinaro – COA Findings

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- The Court of Appeal found that:
  - ▣ Husband's posts expressed apparent despair about the divorce and his separation from the children
  - ▣ Posts did not directly disparage Wife or openly seek to influence the children and were not specifically directed to the children
  - ▣ Posts invited comments from Husband's adult friends and extended family, but were peripherally related to the case and might at worst cause people outside the immediate family to think ill of Wife

# Molinaro v. Molinaro – COA Holding

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- CA Constitution is more protective of free speech rights than the U.S. Constitution.
- California courts require “extraordinary circumstances” before a prior restraint on speech is allowed.
- While Trial court had the power to prohibit Husband from disparaging Wife in the children’s presence, the posting prohibition in the order was an invalid prior restraint.

# Marriage of Ankola – Overview & Key Facts

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- 36 Cal.App.5th 560, 6th Dist., Santa Clara County
- Dissolution case between Priyanka and Manish, no children
- Manish filed a Petition for Nullity first, alleged marriage fraud but was denied
- Priyanka filed a request for DVRO which was denied
- About a year later, Priyanka filed a new request, was granted a 5 year DVRO
- The day after, Manish filed a request for DVRO

# Marriage of Ankola – Procedure

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- Request for Order: Manish filed a request for a DVRO, Priyanka filed a response denying allegations
- Trial Court Ruling: Issued mutual DVROs protecting each party; found that both parties committed domestic violence and neither was the dominant aggressor
- Appellant: Manish appealed the new DVRO against him that was issued as part of the mutual restraining orders



# Marriage of Ankola – COA Holding

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- ❑ Priyanka was not entitled to a DVRO because she had not made a separate request for a DVRO
- ❑ The trial court did not have the jurisdiction to treat this as a modification of Priyanka's existing DVRO because Manish was appealing that DVRO



# Goodwin-Mitchell v. Mitchell - Overview

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- 40 Cal.App. 5th 232, 1st Dist., Div. 3, Alameda County
- Goodwin married Mitchell, applied for green card based on marriage and Mitchell was given a two year conditional visa
- The parties were married in June 2015 and Michael came to the US in November 2016.

# Goodwin-Mitchell v. Mitchell – Key Facts

29

- In February 2017, Michael was arrested for domestic violence, Michael pled no contest to DV and was released on probation
- Carolyn found text messages she believed proved that he was only staying with her until he got his immigration papers
- Carolyn found text messages and made recordings of Michael's infidelity in March 2017
- Carolyn filed for divorce in June 2017 but parties continued to live together until November 2017.

# Goodwin-Mitchell v. Mitchell - Procedure

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- Requests for Order: Wife filed petition for nullity based on green card fraud
- Trial Court Ruling: Trial court granted nullity (annulment) based on fraud.
- Appellants: Husband appealed

# Goodwin Mitchell v. Mitchell – COA Holding

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- Annulment reversed because where the person defrauded with full knowledge of the fraud freely lived with the other person as their spouse
- “Even if we were to believe the statute is outmoded and to disagree with the policies that presumably underlie it, our decision is mandated by the clear statutory language”
- Intent has to be at the time entered into the marriage, at the moment the marriage is made but court did not rule on the issue of Michael’s intent

# Tanguilig v. Valdez – Overview & Key Facts

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- 36 Cal.App.5th 514 (2019), 1st Dist., San Francisco County
- Tanguilig and Valdez were neighbors
- Tanguilig lived with several family members in the same house including his son-in-law
- Valdez blocked Tanguilig's driveway and car with trash cans
- Valdez sprayed Tanguilig and the property with water



# Tanguilig v. Valdez - Procedure

33

- Request for Order: Tanguilig applied for an Elder Abuse Restraining Order (EARO) and requested some family members to be “Additional Protected Persons”
- Trial Court Ruling: Court granted the EARO and included the family members as protected parties
- Appellant: Valdez appealed, arguing in part that good cause did not exist to add Tanguilig’s family members

# Tanguilig v. Valdez – COA Holding

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- Good cause is a relative standard that depends on the circumstances but in general should
  - ▣ Include reasons that are fair, honest, in good faith, not trivial, arbitrary, capricious or pretextual
  - ▣ Reasonably related to legitimate needs, goals and purposes
  - ▣ It is not a formal rule but a factual discussion of reasonable grounds for the order

# Herriott v. Herriott - Overview

35

- 33 Cal.App.5th 212 (2019), 2nd Dist., Div. 8, Los Angeles County
- Former spouses who lived in the same apartment building each requested restraining orders against the other
- Ex spouses are both elderly, have a history of legal actions, complaints and issues against each other
- Adult children observed their history and testified in the case

# Herriott v. Herriott – Procedure

36

- Requests for Orders: Husband filed Elder Abuse Restraining Order against Wife, Wife filed DVRO against husband
- Trial Court Ruling: Court granted both requests with certain modifications
- Appellant: Husband and Wife each appealed

# Herriott v. Herriott –Trial Court Findings

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- Wife had long pattern of abuse against Husband; issued EARO protecting Husband and his brother
- Court could not remove Wife from the apartment and building because it would be an unlawful detainer and outside its jurisdiction; it could only keep her out of Husband's apartment
- Husband had engaged in sufficient abuse, harassment and intentional disturbing the peace, issued DVRO protecting Wife

# Herriott v. Herriott – COA Holding

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- COA would not impose sanctions on former wife for attaching confidential custody evaluation to her appellate brief

- Court was not required to make a “primary aggressor” finding of fact, because not granting mutual DVROs, but an EARO and DVRO
- For purposes of an EARO, a dwelling is the apartment unit of the protected person, not the whole building

# CUSTODY & VISITATION

In re C. M.

Marriage of C.T. and  
R.B.

Darab N. v. Olivera



# In re C.M. - Overview

40

- 38 Cal.App.5th 101 (2019), 2nd Dist., Div. 2, Los Angeles County
- Mother and Father are parents of C.M. Father originally denied parentage of C.M., and stayed away but now wanted to be in C.M.'s life, C.M. is 5 years old
- Mother had participated in voluntary protective services when her boyfriend who is the parent of C.M.'s half sibling, was arrested for

DV



# In re C.M. – Key Facts

41

- Department of Children and Family Services filed a petition alleging that Mother and boyfriend had history of engaging in domestic violence in the presence of the children
- Trial court ordered Mother to take 52 week batterers intervention program, parenting class and other programs
- C.M. was released to Father's custody with supervised visits to Mother

# In re C.M. – Procedure

42

- Request for Order: Mother filed to regain custody of C.M., DCFS recommended sole physical to Father and joint legal custody, Minor's counsel and Father wanted sole legal custody for him.
- Trial Court Ruling: Court ordered joint legal custody
- Appellant: Father appealed, argued court should have applied the Family Code § 3044 presumption against granting custody to a parent against whom there is a finding of domestic violence in the last 5 years.

# In re C.M. – COA Holding

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- Family Code 3044's rebuttable presumption does not apply in dependency cases
- Family and Juvenile courts have separate statutes and distinct purposes and the juvenile court can make orders only after a child has been declared a dependent of the court
- Juvenile court is best situated to make custody determinations based on the best interest of the child without any preferences or presumptions

# In re C.M. - Discussion

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- Is there a larger issue here beyond simply being two different statutory schemes in the two court systems?
- In what ways do the two systems overlap and intersect despite having distinct purposes?
- Does the best interest of the child change depending on the court system? Under the law? In practice?

# Marriage of C.T. and R.B. - Overview

45

- 33 Cal.App.5th 87 (2019) - 4th District, Div. 2, Riverside County
- C.T. and R.B. are divorced parents of 12 year old child
- R.B., Father, the non custodial parent, was living outside California since 2011
- C.T., Mother, is the custodial parent living in California
- Child had lived with Mother since birth in 2006 in CA

# Marriage of C.T. and R.B. - Key Facts

46

- Parties had joint legal custody & Mother had primary physical custody
- Both parents accused the other parent of child abuse
- In 2010, court mediator said Mother was least likely to share child, but still recommended primary physical custody to Mother
- Child had step-sibling relationships since 2016, all in CA
- Court mediator recommended joint legal & physical, with primary residence of child with Mother

# Marriage of C.T. and R.B. - Procedure

47

- Request for Order: Father filed request for primary physical custody and relocation of child to state where he already lived
- Trial court ruling: Granted Father's request for primary physical custody and ordered that the child relocate outside California
- Appellant: Mother appealed the relocation and the change in custody

# Marriage of C.T. and R.B. - Trial Court

48

- Ordered it was necessary to change custody and relocate child because Mother has not and would not comply with existing order
- Made 8 findings that Mother had not complied with orders re: failure to share information and consult.

- Expressed clear frustration with Mother's lack of compliance over long period of time with child custody orders.
- Stated Mother admitted violating child custody orders
- Had already decided against Mother after her opening statement



# Marriage of C.T. and R.B. – COA Holding

49

- C.T.'s (Mother's) violations of custody order do not meet R.B.'s (Father's) initial burden of proof and do not overcome detriment to the child from moving out of the state
- R.B. (Father) failed to show:
  - ▣ R.B.'s relocation made it essential for welfare of child to change physical custody
  - ▣ Relocation of child would not be detrimental to child's existing relationships
  - ▣ It would be in best interests of the child to move

# Marriage of C.T. and R.B. – COA Holding cont.

50

- COA said “it does not condone or minimize the seriousness of C.T.’s custody order violations.”
  - But “the focus should be on the best interests of [the child], not on penalizing the custodial parent by removing the child from the parent.”
- COA noted R.B. failed to pay child support; while not valid basis for denying child custody, “shows unwillingness to comply with court orders issued in furtherance of best interests of child.”

# Darab N. v. Olivera - Overview

51

- 31 Cal.App.5th 1134, 2nd Dist., Div. 1, Los Angeles County
- Darab N. and Olivera are unmarried parents but had a tribal domestic partnership
- Child born with heroin in system, detained by DCFS, was returned but Olivera relapsed
- Darab filed parentage action, asked for ex parte orders on custody

# Darab N. v. Olivera – Key Facts

52

- Darab had temporary sole legal and physical custody, with supervised visitation for Olivera
- Olivera was unrepresented at ex parte hearing but went through several lawyers soon after
- Olivera had not filed a response to the petition for parentage
- During this case Darab requested and received a DVRO protecting him from Olivera for 3 years

# Darab N. v. Olivera - Procedure

53

- Requests for Order: Darab N. through counsel filed for default of the petition, Olivera filed a request to set aside, request for fees, and enforcement of subpoenas for Darab's medical records
- Trial Court Ruling: Trial court granted default, denied set aside, request for fees and subpoenas.
- Appellants: Olivera appealed

# Darab N. v. Olivera – COA Holding

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***“The record abounds with evidence that [Olivera and attorney] wielded aggressive litigation tactics as merely one part of a multi-faceted attack on [Darab]” p. 1145***

- No relief from default judgment where fault of the attorney
- Darab’s privilege claim over his rehab and other medical records was valid
- No attorney’s fees
- Even if the trial court erred in granting the default it was harmless error

# CRIMINAL

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U.S. v. Lopez

People v. Sexton

People v. Brackins

People v. Caceras

In Re R.C.



# U.S. v. Lopez – Overview & Key Facts

56

- 913 F.3d 807 (2019) Ninth Circuit, Arizona
- Lopez said Ex- boyfriend came to her house and asked her to buy gun
- When Lopez refused, Ex grabbed her arm and threatened to shoot up Lopez's house and family if she did not buy gun
- Ex came back again, Lopez refused. Ex grabbed her: "I already told you what I was going to do if you don't get this gun for me. I know you don't want anything happening to your mom and sisters." Then Lopez went with Ex to buy gun



# U.S. v. Lopez – Procedure

57

- Charges: Lopez charged with of purchasing a firearm with a false ID; Lopez asserted the defense of duress and asked court to allow testimony from expert witness on Battered Women's Syndrome ("BWS")
- District Court Ruling: Convicted on charge, court did not allow expert, said BWS evidence incompatible with defense of duress, which has objective reasonable person standard
- Appellant: Lopez appealed

# U.S. v. Lopez – 9th Circuit Holding

58

- Expert testimony on Battered Woman Syndrome (“BWS”) can be used to support a defense of duress and rehabilitate credibility. Excluding this testimony is not harmless error and is prejudicial
- BWS compatible with assessing whether defendant had “reasonable” opportunity to escape
- Jury may consider defendant’s prior experience with police response to abuse for whether it was reasonable

# People v. Sexton - Overview

59

- 37 Cal.App.5th 457 (2019), 4th Dist., Div. 1, Riverside County
- Sexton was married and had two children with Wife
- Wife accused Sexton of domestic violence, then recanted, then went back to original statements
- Prosecution called expert to testify about Intimate Partner Battering

# People v. Sexton – Key Facts

60

- Wife said she wanted divorce. Sexton said he would leave, texted saying he left; when she came back to house he was there. Strangled and sexually assaulted her
- Wife first contacted police when she tried to leave Sexton for the second time, then two months later she said she did not want to press charges
- Children testified to the DV including Sexton coming to the house with a gun
- Three other women testified to being abused by Sexton

# People v. Sexton – Procedure

61

- Charges: Eight counts of criminal acts against ex-wife
- Trial Court Ruling: Sexton was convicted of spousal rape and domestic violence
- Appellant: Sexton appealed, arguing that CALCRIM 850 jury instruction on DV expert testimony lead jurors to believe that the victim's statements were true

# People v. Sexton – Trial Court

62

- Expert testified about:
  - ▣ Ways in which survivors can become acclimated to abuse
  - ▣ Challenges in recognizing abuse as it happens gradually
  - ▣ Cycle of violence including returning to abusive partners
  - ▣ Non-cooperation with law enforcement and recantation

# People v. Sexton – COA Holding

63

- Reasonable jurors would understand the jury instruction does not mean that if characteristics of intimate partner battering are satisfied then this indicates victim is telling the truth; Conviction upheld



# People v. Brackins – Overview & Procedure

64

- 37 Cal.App.5th 56 (2019), 6th Dist., Santa Clara County
- Charges: Brackins charged with assault for two incidents against his ex-girlfriend
- Trial Court Ruling: Brackins convicted of aggravated assault, corporal injury to former cohabitant, attempting to dissuade witness, vandalism
- Appellant: Brackins appealed, argued jury instruction CALCRIM 850 told the jury it could use expert testimony to evaluate ex's credibility



# People v. Brackins – Key Facts

65

- Brackins and ex were in a relationship for 10 years and had 4 children
- Brackins charged for two incidents but evidence was presented that he physically assaulted ex girlfriend numerous times
- Ex denied DV, claimed they only had arguments and she called police because she was mad, then claimed to have no memory of incidents or talking to police and any injuries were self-inflicted
- Ex told defense investigator she relied on defendant to take care of children

# People v. Brackins – Trial Court

66

- Prosecution Expert on Intimate Partner Battering and its effects:
  - ▣ Testified about cycle of violence, tension stage, recantation, hostility to prosecution
  - ▣ Made clear that he was only testifying about domestic violence and common experiences, not giving an opinion on what happened in this case
  - ▣ On cross said he had observed situations where one person lies to get the other person in trouble or out of trouble

# People v. Brackins – COA Holding

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- Expert testimony about minimization and recantation did not impermissibly stray into direct determination about whether abuse occurred
- When an expert testifies about an abstract proposition such as the length of time for strangulation to lead to unconsciousness, jury can indirectly use that to evaluate a victim's testimony

# People v. Caceres – Overview & Key Facts

68

- 39 Cal.App.5th 917, 2nd Dist, Div. 1, Los Angeles County
- Caceres and E.S.J. dated for 7 year and have child in common
- Caceras came to her home, yelling that if she did not open up he would kill her, claiming that if she called the police by then he would have “chopped her up”, E.S.J. point of a knife

# People v. Caceres – Procedure & Holding

69

- Charges: Caceres charged with criminal threats and violating a protective order with a prior conviction for violating a court order
- Trial Court Ruling: Caceres pled no contest to criminal threats; protective order violation was dismissed; CPO issued upon conviction
- Appellant: Caceras appealed CPO saying criminal threats was not a crime involving domestic violence
- COA Holding: Appellate Court affirmed

# In re R.C. – Overview & Key Facts

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- 39 Cal.App.5th 302 (2019), 2nd Dist., Div. 4, Los Angeles County
- R.C. and K.V. were having sex in a friend's bedroom.
- K.V. stopped when she saw R.C. holding phone & recording
- R.C. tried to force her into sexual activity with him and his friend in exchange for not sharing the video
- R.C. claimed he deleted the video, but then classmates had it

# In re R.C. – Procedure

71

- Charges: Petition filed against 17 year old for unauthorized invasion of privacy for recording consensual sexual encounter with classmate K.V.
- Trial Court Ruling: Charge was sustained
- Appellant: R.C. appealed, only argument was that phone was not concealed for purposes of the law

# In re R.C. – COA Holding

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- Upheld charge and said “[t]his case underscores the critical need to educate our youth about the evils of misogyny and sexual bullying and the virtues of respect, kindness and compassion”
- Court concerned about “the availability and effectiveness of existing programs to help R.C. understand the gravity, impact, and reprehensibility of his sexual bullying, lack of compassion, and invasion of K.V.’s privacy”



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# OTHER CASES

# Diaz-Quirazco v. Barr

- 931 F.3d 830, Ninth Circuit, Oregon
- Diaz-Quirazco is a native and citizen of Mexico
- Mother of child in common was granted restraining order against him
- He was ordered removed and immigration judge ruled he was ineligible for cancellation of removal because he violated protection order
- Ninth Circuit holds that contempt of court ruling for violation of RO is a conviction under the INA, so removable

# Thank You!

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