



**A Report of the PROGRAM TO PROVIDE LEGAL COUNSEL  
TO INDIGENT PERSONS IN RESTRAINING ORDER CASES  
to The Connecticut General Assembly**

June 24, 2026

Reporting Period: July 1, 2025 to March 31, 2026

Submitted pursuant to Public Act No. 21-78 Sec. 15. Paragraph (5). *AN ACT CONCERNING THE DEFINITION OF DOMESTIC VIOLENCE, REVISING STATUTES CONCERNING DOMESTIC VIOLENCE, CHILD CUSTODY, FAMILY RELATIONS MATTER FILINGS AND BIGOTRY OR BIAS CRIMES AND CREATING A PROGRAM TO PROVIDE LEGAL COUNSEL TO INDIGENTS IN RESTRAINING ORDER CASES.*

## Executive Summary

The Temporary Restraining Order Program (TRO Program) administered by Connecticut Bar Foundation (CBF) aims to **improve safety, access to justice, and court outcomes for victims and survivors of domestic violence** by connecting them with legal assistance during the restraining order process.

Launched in 2022, Connecticut’s TRO Program supports survivors at **two especially important stages**: first, when they are deciding whether and how to apply for a temporary restraining order, and second, when they appear at the evidentiary hearing where the court decides whether the temporary order should be extended.

This report will focus on available TRO Program data from July 1, 2025 to March 31, 2026. Data from April 1, 2026, to June 30, 2026, will be included in a supplemental report, which will be made available by September 30, 2026.

**Domestic violence survivors are significantly more likely to obtain protective orders when they have counsel.** Among program participants with a reported ex parte outcome this period, approximately **70% resulted in the ex parte order being granted**. Additionally, **75% of represented applicants who reached an evidentiary hearing secured long-term legal protection** – compared to only about 30% of self-represented litigants nationally, demonstrating **the program’s clear impact**.

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**Through Q1–Q3, the program reached hundreds of survivors and helped secure both immediate and continued court protection:**

**702** cases opened

**736** cases closed

**322** ex parte orders granted

**240** orders entered after hearing

**631** instances of pre-filing counsel

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Program data demonstrates that TRO providers are helping survivors obtain court protection through **a broad range of legal services provided before, during, and after** the filing of TRO applications. Program data and grantee reports also identify an important area for continued growth: many applicants receive help before filing, but representation does not always continue through the full restraining order process. While continuing to pursue a protective order is not the best safety option for every case, increasing engagement throughout the process in order to reduce no-shows and withdrawals could increase successful outcomes while maintaining similar provider capacity, making this one of the most efficient areas for **potential improvement and partnership**.

The TRO Program continues to reach deeply into Connecticut’s most vulnerable communities; demographic data for the program underscores **the intersectional nature of domestic violence**. Women of color – often navigating specific systemic barriers related to race, language, immigration status, and economic insecurity – are disproportionately represented among those seeking protection.

Providers within the TRO Program are **responsive to complex abuse dynamics**. Aggregated client narratives include cases involving physical assault, strangulation, threats with weapons, stalking, technology-facilitated abuse, coercive control, trafficking, financial abuse, elder abuse, and abuse involving children. The legal services provided were tailored to those circumstances and **address custody, visitation, housing, financial, and family-law components in addition to protective orders**.

Reporting by the legal service providers funded by the TRO Program confirm that the documented services represent highly individualized work: **trauma-informed, culturally responsive providers** are helping applicants assess safety risks, understand whether a restraining order is the right remedy, prepare for hearings, connect with domestic violence advocates, and address related legal issues that may affect housing, family stability, or **immediate safety**.

## Program Background

### History

In its 2021 Regular Session, the Connecticut General Assembly expanded its investment in providing increased access to legal counsel to individuals interested in pursuing a temporary restraining order in Public Act 21-78, later codified in section 46-15f of the Connecticut General Statutes. Section 15 of the Act established an ongoing grant program to provide legal representation to indigent individuals who express an interest in applying for a temporary restraining order (TRO) under section 46b-15 of the Connecticut General Statutes, at no cost to the individual (“TRO Program”).

The Act allows for grant awards (1) to provide services in the judicial districts of Bridgeport, Hartford, New Haven, Stamford-Norwalk or Waterbury, and (2) in an amount not to exceed \$200,000, except that a grant to provide services in the judicial district with the highest average number of applications for restraining orders under section 46b-15 over the previous three fiscal years may receive a grant of not more than \$400,000. CBF was designated as the program administrator and after issuing an annual RFP process, funded CLS, GHLA, and NHLAA as the legal aid organizations to provide these services in the designated judicial districts.

For each year that funding is provided for the TRO Program, CBF shall either conduct, or partner with an academic institution or other qualified entity for the purpose of conducting, an analysis of the impact of the program, including, but not limited to, (1) the procedural outcomes for applications filed in association with services provided by grant recipients under the program, (2) the types and extent of legal services provided to individuals served pursuant to the program, including on matters ancillary to the restraining order application, and (3) the number of cases where legal services were provided before an application was filed but legal representation did not continue during the restraining order process and the reasons for such limited representations.

The TRO Program is currently in its fourth year of operation, having launched on March 1, 2022. Initially, the program followed a March-to-February cycle. However, during the previous grant year, the grant cycle was extended by four months to June 30, 2025 in order to align with the State of Connecticut’s fiscal year and with Judicial Branch data related to TROs. The current grant period is July 1, 2025 to June 30, 2026. Beginning in FY 2027, annual reporting will be provided by CBF no later than September 30th and will cover the full fiscal year grant period, rather than requiring an addendum.

### Overview of TRO Case Services and Outcomes for Reporting Period

TRO cases have a variety of outcomes depending on the details of the case, the client’s decision regarding how they will proceed, and the Court’s response to the application. One case can have multiple outcomes and types of legal assistance provided.

<b>Providers by Judicial District</b>						
Connecticut Legal Services: Fairfield/Bridgeport JD, Stamford/Norwalk JD, Waterbury JD Greater Hartford Legal Aid: Hartford JD New Haven Legal Assistance Association: New Haven JD						
Reporting Period: July 1, 2025 – March 31, 2026	Totals	CLS - Fairfield	CLS - Stamford	CLS - Waterbury	GHLA - Hartford	NHLAA - New Haven
<b>A) The procedural outcomes of restraining order applications filed,</b>						
Ex parte relief granted	322	13	19	45	85	160
Ex parte relief denied	137	10	6	32	53	36
Application dismissed, Applicant did not appear	104	5	0	22	41	36
Negotiated settlement	44	1	5	8	5	25
Petitioner obtained assistance to understand legal documents	441	51	55	134	190	11
Orders entered after hearing	240	4	15	34	97	90
No Outcome Obtained	17	1	0	4	0	12
Application withdrawn prior to hearing	30	3	0	8	6	13
Petitioner obtained realistic case assessment and/or legal counseling	499	51	50	135	250	13
Application dismissed after hearing	104	7	7	14	38	38
Petitioner received information to assist with informed decision-making	501	51	62	131	244	13
Legal representation was provided to assist in preparing and filing a TRO application	414	29	29	61	158	137
<b>B) The number of instances where legal counsel was provided prior to the filing of an application but not during the remainder of the restraining order process</b>						
Counsel provided prior to filing TRO Application	631	49	57	123	192	210
Counsel provided after filing TRO Application	246	49	48	48	36	65
<b>Reasons for limited representation:</b>						
Applicant did not take steps directed for representation	162	0	0	7	65	90
Applicant Refused Services	20	0	0	7	11	2
Services of Process Failed	10	1	0	3	3	3
Applicant Over Income	21	4	2	2	2	11
Limited Attorney Resources	117	12	18	19	50	18
Applicant Withdrew Application	31	2	2	5	16	6
<b>C) Information on any other legal representation provided to individuals pursuant to the program on matters that were ancillary to the circumstances that supported the application for a restraining order.</b>						
Ancillary Cases	37	1	1	4	31	0

The following is an explanation for the above data elements reported by the providers:

#### A.) Procedural Outcomes

*Ex parte relief granted* – Application granted based solely on the applicant’s account without the respondent’s notification or presence.

*Ex parte relief denied* – Application denied based solely on the applicant’s account.

*Negotiated settlement* – Applicant and respondent meet with the family relations officer of the court to discuss an agreement to grant a level of relief. The agreement is then presented to the Court for approval or denial.

*Orders entered after hearing* – the restraining order was granted after a hearing and orders of protection entered.

*Application dismissed; applicant did not appear* – the application was denied for failure to prosecute because the applicant did not come to the hearing.

*Application withdrawn prior to hearing* - Applicant decided not to pursue the matter after filing application but before the hearing.

*Application dismissed after hearing* - After a hearing on the record, the court did not find sufficient evidence to grant the relief sought by the applicant.

*Petitioner obtained assistance to understand legal documents* – Legal services were provided to review and explain legal documents.

*Petitioner obtained realistic case assessment and/or legal counseling* – Legal advice and legal counseling were provided regarding the restraining order application.

*Petitioner received information to assist with informed decision-making* – Legal advice and information was provided about a range of safety options and legal remedies, including information about potential benefits and risks in applying for a restraining order, and the availability of a range of safety options.

*Legal representation was provided to assist in preparing and filing a TRO application* – Legal services were provided regarding the 46b-15 restraining order application.

#### B.) Reasons Representation Limited

*Services of process failed* – Court papers were not properly served on the respondent. Ex-parte relief was granted, but either the applicant did not submit papers to the court marshal, or the marshal was not able to serve papers to the respondent.

*Applicant over income* – An income eligibility check was completed by the provider, as statutorily required. Applicant was determined to be over the program income limit, but staff provided advice as the situation was urgent. The intake is logged and counted as a program case because program staff time and other resources were used to provide guidance.

#### C.) Ancillary Services

Legal service needs in addition to the client's interest in filing an application for a temporary restraining order were identified during the representation relating to filing the application.

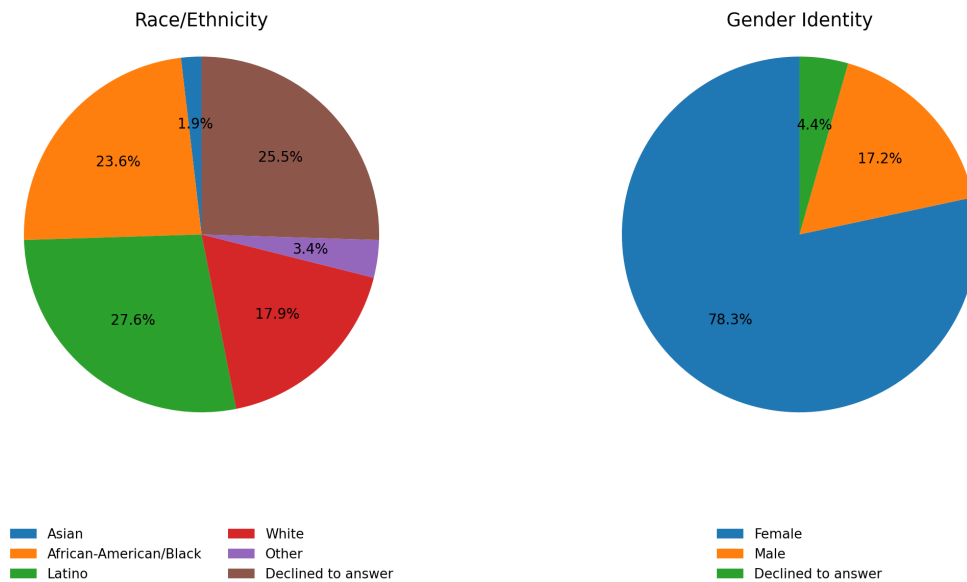
#### Client Demographics

The demographic make-up of those served by Connecticut's TRO Program reflects national patterns and also highlights how structural inequities like economic instability, immigration status, housing insecurity, and historical mistrust of legal systems intersect to shape both the risk of victimization and access to justice.

Demographic figures from this reporting period suggest that the TRO Program continues to reach deeply into Connecticut's most vulnerable communities. Women of color –

particularly Black women – are statistically more likely to be victims of intimate partner homicide than their white counterparts.<sup>1</sup>

### TRO Program Demographics, Q1–Q3



Source: Q1–Q3 Caseload Reports from CLS, GHLA, and NHLAA.

Economic vulnerability and financial abuse can exacerbate the challenges faced by those in abusive relationships and is more pronounced for women from marginalized communities because of structurally limited economic opportunities. Without financial resources to support themselves and their children independently, leaving the relationship is not only emotionally difficult, but materially dangerous, and can make it difficult to afford an attorney or gain access to the justice system. Fear of homelessness, weaponization of immigration status, housing instability, and/or lack of access to health insurance are realistic concerns for many.

Individuals facing domestic violence must feel safe, understood, and empowered in order to take that first step toward survivorship. The TRO Program, which includes culturally competent and trauma-informed services, has proven to be an effective tool to ensure that individuals from our most marginalized communities feel this way and have access to legal services to ensure that they, and their children, can be safe and free from family violence.

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*The TRO Program is successfully helping survivors like B.B. (initials used in examples do not reflect clients' names) address family safety and financial concerns while accessing legal services to secure emergency protection.*

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<sup>1</sup> Rowh, A., & Jack, S. (2024). Notes from the field: Intimate partner homicide among women — United States, 2018–2021. *Morbidity and Mortality Weekly Report*, 73(34), 754–756. <https://doi.org/10.15585/mmwr.mm7334a4>

*A mother of three whose husband was particularly abusive when drinking, B.B. was concerned for her children's safety but did not know how she would be able to financially support them on her own.*

*After speaking to a legal services attorney, B.B. filed a restraining order application that included a request for custody and supplemental orders of maintenance. The Court issued ex parte relief.*

*The legal services attorney then represented B.B. at the hearing and successfully negotiated a settlement that included a continuation of the ex parte orders as well as a provision that B.B.'s husband must continue to pay the rent for the family home. With the help of her attorney, B.B. and her children were safer and more financially stable.*

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## **Procedural Outcomes for TRO Applications Filed with Program Support**

### **Ex parte Orders**

The data show that the TRO Program is contributing to meaningful and life-saving protective outcomes for victims and survivors of domestic violence.

Among applications with a reported ex parte outcome, approximately 70% resulted in the ex parte order being granted (322 ex parte orders granted and 137 ex parte orders denied during the first three quarters of the current grant cycle). For survivors seeking immediate protection, this emergency order can be a critical first step toward safety.

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*One client, C.C., came to legal services after trying unsuccessfully to file an application on her own for a restraining order against her ex-husband.*

*The application she filed was denied because C.C. had trouble articulating what her ex-husband was doing and the severity of the threats. C.C.'s ex-husband was incarcerated in another state and was using an electronic device smuggled into the prison to threaten and harass her via social media.*

*A legal services attorney helped C.C. prepare a new application, and the Judge issued a full restraining order ex parte.*

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### **Evidentiary Hearings**

TRO providers also reported 240 orders entered after hearing during the reporting period, an important measure of program impact as the court determines whether the initial temporary order should be extended. Our court system is designed for trained and

licensed attorneys, not pro se litigants; evidentiary hearings are procedurally complex and difficult to navigate without the requisite knowledge. Self-represented parties may be unsuccessful simply because they are unfamiliar with the rules even when their underlying claims are strong. These outcomes in the TRO Program cases represent critical protections for survivors.

During this reporting period, 75% of represented applicants who reached an evidentiary hearing secured long-term legal protection. In stark contrast, national studies show that only 32% of self-represented litigants obtain final relief in similar proceedings<sup>2</sup>, highlighting just how pivotal legal representation is in achieving these outcomes.

### Negotiated Settlements

In some cases, attorneys helped resolve matters outside the courtroom entirely, with 44 negotiated settlements reflecting a critical alternative pathway to protection. These early, attorney-led interventions can de-escalate volatile situations and help survivors avoid the trauma and risk of adversarial litigation, further demonstrating the comprehensive value of the TRO Program.

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*A real-life example of how counsel can improve safety through a negotiated settlement is illustrated by J.J.'s case. A legal services attorney represented J.J., a survivor of emotional abuse, coercive control, and stalking by her child's father. Although the abuse had not escalated to physical violence, the pattern of intimidation and control left J.J. isolated and fearful for her safety and well-being.*

*The attorney worked closely with J.J. to prepare the restraining order application and then provided representation at the hearing. Through skilled, trauma-informed advocacy and negotiation, the legal services attorney secured an agreement for a full restraining order and arranged for all child visitation exchanges to be handled by family members. As a result, J.J. no longer had to come into contact with her abuser in order to co-parent their child.*

*Without counsel, survivors experiencing coercive control often struggle to obtain meaningful protection because the abuse may leave few visible signs despite posing significant safety risks. Because of the TRO Program, this agreement was entered as a court order, providing J.J. with legal protection, increased safety, and the ability to move forward without fear of future encounters with her child's father.*

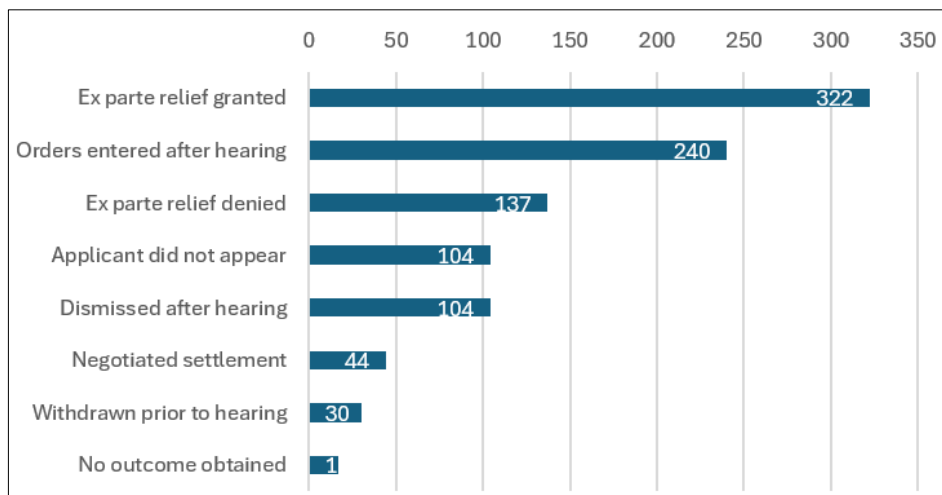
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<sup>2</sup> Rosenberg, J. S., & Grab, D. A. (2015, July 21). *Supporting survivors: The economic benefits of providing civil legal assistance to survivors of domestic violence*. Institute for Policy Integrity, New York University School of Law. <https://policyintegrity.org/publications/detail/supporting-survivors>

Reported outcomes show both the strength of the TRO Program and the continuing challenges faced by survivors. The high number of dismissals due to applicant nonappearance reflects barriers that prevent some survivors from completing the court process. In domestic violence cases, nonappearance may reflect fear, trauma, safety concerns, transportation barriers, childcare responsibilities, work obligations, lack of safe communication, or other practical obstacles. This should be understood as an area for additional program design and support, not simply as a lack of applicant follow-through.

### TRO Program Procedural Outcomes, Q1-Q3



Source: Q1-Q3 Data Collection Reports from CLS, GHLA, and NHLAA.

## Types and Extent of Legal Services Provided

The data show that the TRO Program is connecting survivors with impactful legal services throughout the restraining order process, including before an application is filed.

The TRO program successfully funds counseling, document review, legal information, and practical guidance in addition to formal court representation. Assistance from counsel can help reduce confusion, improve confidence, and support safer decision-making for survivors, many of whom enter the court process without prior experience with the legal system.

Across the first three quarters, the program reported 631 instances of counsel provided before a TRO application was filed, a significant measure of early intervention. Legal assistance at this stage can help survivors evaluate whether a TRO is the right legal option, write stronger applications, prepare necessary information for court appearances, and understand what the process will involve, including important safety considerations for themselves and their children.

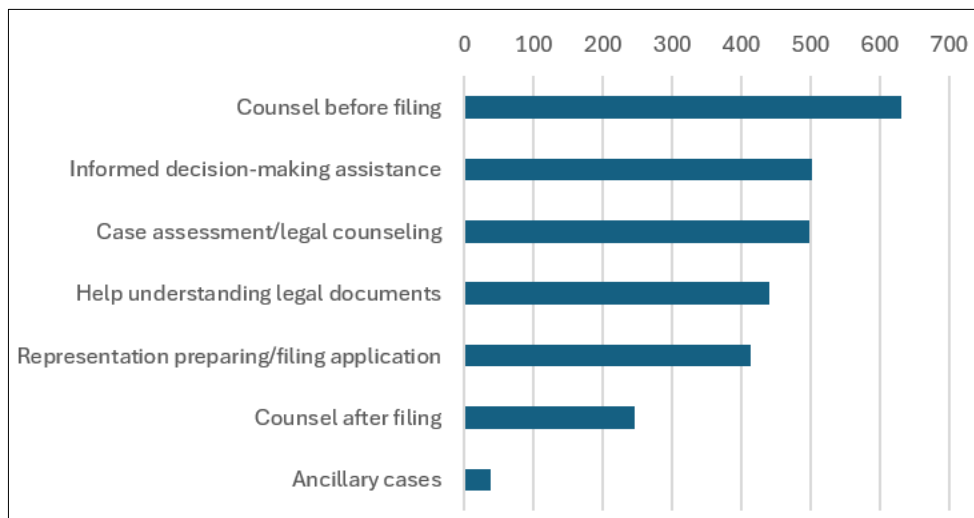
Legal assistance at this stage included:

- 501 instances in which petitioners received information to assist with informed decision-making
- 499 instances in which petitioners received realistic case assessment or legal counseling
- 441 instances in which petitioners received assistance understanding legal documents

In this period, the TRO Program reported 414 instances of legal representation to assist in preparing and filing a TRO application, a core function of the program. TRO paperwork can be difficult for a layperson to complete, especially while experiencing trauma or fear. Legal assistance can help ensure that applications are focused on the information the court needs to grant an initial ex parte protection order.

TRO providers also reported 246 instances of counsel provided after the TRO application was filed during this reporting period, a second core function of the program as a judge decides whether to extend long-term protection. Nationally, only about 30% of self-represented applicants successfully obtain long-term protection at this stage. In contrast, 75% of applicants represented by a TRO provider in an evidentiary hearing secured long-term legal protection.

### TRO Program Services Provided, Q1-Q3



Counts are service instances, not necessarily unique individuals.

Source: Q1-Q3 Data Collection Reports from CLS, GHLA, and NHLAA.

The program also reported 37 ancillary cases: related legal matters that arise from or are connected to the survivor’s circumstances but are not limited to the TRO application itself. Addressing ancillary legal needs is important because domestic violence often creates

multiple legal problems at once. A survivor may need protection from abuse, but also help with housing stability, benefits, child-related issues, financial insecurity, or other related civil legal needs.

Through ancillary support and provider partnerships, the TRO program strengthens safety planning and community connection. Grantee reports show that providers are working with domestic violence agencies, courthouse staff, interpreters, advocates, and other partners to help survivors access both legal and nonlegal support.

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*In one case, a legal services attorney is now representing F.F., a young mother of two toddlers, in an ancillary custody case after initially providing TRO Program services.*

*F.F.'s husband beat her so severely that she suffered a concussion. He threatened to kill F.F. and himself.*

*With her attorney's support, F.F. was granted a full ex parte restraining order, which was then extended at hearing.*

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Taken together, the service data show that the program is reaching survivors early, helping them understand their legal options, assisting with TRO applications, and supporting many applicants through the court process.

## **Limited Representation: Cases Where Counsel Was Provided Before Filing but Did Not Continue**

During the current report period, the TRO Program reported 631 instances of counsel provided before filing and 246 instances of counsel provided after filing.

For many cases, continuing representation is not required or not possible. Applicants may make an informed decision not to file, withdraw the application, or find resolution in another way; others may be found ineligible, may decline further services, or may become unreachable.

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*TRO providers report that for some cases, the best safety option may **not** be to extend a restraining order. Experienced and trauma-informed providers are able to tailor support to each applicant's case. For a survivor who may be in hiding from their abuser, filing would alert the abuser to their location; alternative safety planning may be a better option.*

*Some survivors, particularly when sexual violence or trafficking is involved, may decide that they would prefer alternate options rather than a hearing*

*in which they would need to testify and be cross-examined – potentially by their abuser if self-represented.*

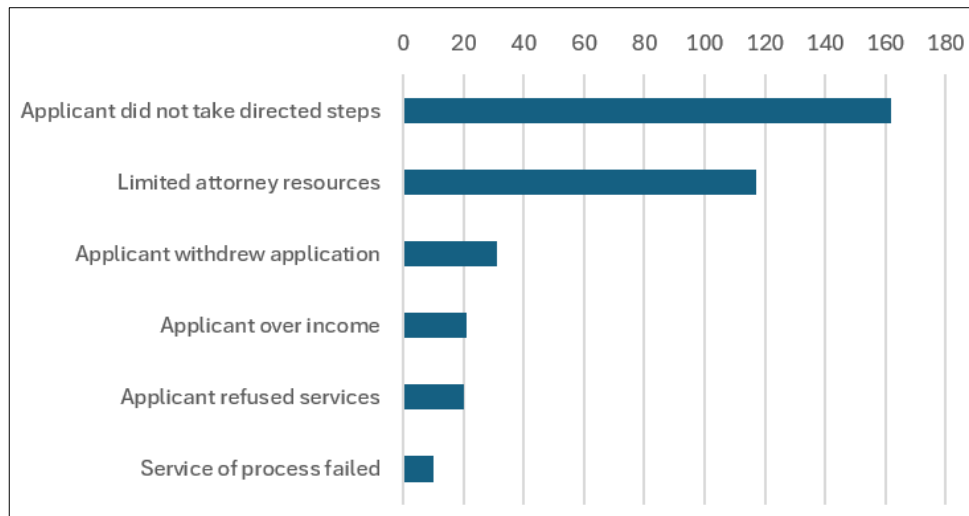
*Other circumstances may be better addressed through a different type of case like custody or eviction, and TRO providers often hear from court staff and clerks that they are better able to manage their dockets and allocate resources where they belong due to TRO recommendations and referrals.*

*Finally, providers report that some clients may not continue to a hearing because the process **worked**; the temporary restraining order addressed the client’s need for immediate safety and does not need to be extended.*

Providers must allocate limited resources, balancing the ability to assist a higher volume of applicants with effective brief services in critical early stages with the need to provide continued representation for more in-depth, time-consuming cases in which counsel can have the greatest impact. Assisting TRO applicants during early stages of the process is also how providers build vital trust-based relationships with clients and evaluate which cases may benefit from extended representation.

Of the 361 instances of limited representation reported, the most common reason was that the applicant did not take the steps directed for representation to continue, which was reported 162 times, or approximately 45%. An additional 5% of instances of limited representation were due to clients turning down further services.

### Reasons Representation Did Not Continue, Q1-Q3



Source: Q1-Q3 Data Collection Reports from CLS, GHLA, and NHLAA.

Clients failing to appear in court or to follow up on recommendations reflects an innate challenge in working with survivors of domestic violence. Disengagement with the court process should not be seen as a failure to cooperate but within the context of trauma, fear

of retaliation, unsafe communication, housing instability, transportation problems, lack of childcare, work conflicts, and dangerous pressure from the respondent experienced by survivors.

Increasing engagement and trust throughout the process in order to reduce no-shows and withdrawals could increase successful outcomes while maintaining similar provider capacity, making this one of the most efficient areas for potential improvement and partnership. Providers continue to work towards higher rates of continued representation through more intentional follow-up processes, safer and more flexible communication methods, stronger coordination with advocates, and practical supports that help survivors remain connected to counsel and the court process.

The second most common reason cited was limited attorney resources, reported in approximately 32% of instances of limited representation, indicating that demand for continued representation may exceed available staffing. Demand outstrips capacity across legal aid programs; CBF's recently completed statewide Legal Needs Assessment showed that 72% of low-income households in Connecticut have experienced civil legal needs, while two in five residents were unable to access help due to limited capacity.<sup>3</sup> Increasing legal aid capacity calls for systemic solutions, advocacy, and resource allocation.

TRO providers have continued to address capacity through expanded training and support to improve retention, adjusting job categories and hiring strategies, and working with the courts to improve physical access and connectivity to increase efficiency.

The data suggests that the program is succeeding in providing early access to legal help as well as significant success when applicants are represented at hearing, but that continuity of representation remains a challenge. The program's impact is likely strongest when survivors receive assistance before filing and throughout the hearing, where longer-term protection is decided.

## Conclusion & Looking Ahead

The Q1-Q3 data show that the TRO Right to Counsel Program is advancing its core purpose: helping victims and survivors of domestic violence access legal assistance during a high-stakes court process that directly affects their safety.

The program is producing meaningful results and reaching many members of marginalized communities; survivors are receiving early legal advice, help preparing TRO applications, assistance understanding the process, and representation in cases that result in court-

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<sup>3</sup> CTData Collaborative. (2025, October). *Civil Legal Needs Assessment: 2025 report*. Report commissioned by the Connecticut Bar Foundation. <https://www.ctbarfdn.org/ctlegalneeds/ctlegalneeds.html>

ordered protection. The number of ex parte orders granted, and orders entered after hearing demonstrates that the program is having a real impact.

Key areas of focus moving forward will include increased collaboration to promote best practices and consistent data reporting across providers as well as addressing both provider capacity and removing systemic and practical barriers that prevent survivors from staying connected to representation throughout the court process.

When asked about successes during this grant period, one provider stated, “We receive an incredible number of calls from clients thanking the unit’s staff attorneys for the work they have done on their cases, as well as many emails from clients expressing gratitude for the support and guidance they have received during a very difficult time in their lives.”

The TRO Program continues to provide critical services to victims and survivors of domestic violence. Domestic violence is a public safety issue, and we must continue to invest in this program while strengthening staff recruitment and retention. With continued funding and policy support the program can continue to ensure the safety of our most vulnerable Connecticut residents so that they may live their lives free from violence.