

2024

Language Barriers in the U.S. Legal System for Primarily Spanish Speakers: Attorney Perspectives and Potential Solutions for True Equal Access

Emma F. Kizer
University of Northern Iowa

Let us know how access to this document benefits you

Copyright ©2024 Emma F. Kizer

Follow this and additional works at: <https://scholarworks.uni.edu/hpt>

Recommended Citation

Kizer, Emma F., "Language Barriers in the U.S. Legal System for Primarily Spanish Speakers: Attorney Perspectives and Potential Solutions for True Equal Access" (2024). *Honors Program Theses*. 931.
<https://scholarworks.uni.edu/hpt/931>

This Open Access Honors Program Thesis is brought to you for free and open access by the Student Work at UNI ScholarWorks. It has been accepted for inclusion in Honors Program Theses by an authorized administrator of UNI ScholarWorks. For more information, please contact scholarworks@uni.edu.

Offensive Materials Statement: Materials located in UNI ScholarWorks come from a broad range of sources and time periods. Some of these materials may contain offensive stereotypes, ideas, visuals, or language.

LANGUAGE BARRIERS IN THE U.S. LEGAL SYSTEM FOR PRIMARILY SPANISH
SPEAKERS: ATTORNEY PERSPECTIVES AND POTENTIAL SOLUTIONS FOR TRUE
EQUAL ACCESS

A Thesis Submitted
In Partial Fulfillment
Of the Requirements for the Designation
University Honors with Distinction

Emma F. Kizer
University of Northern Iowa
May 2024

This Study by: Emma Kizer

Entitled: Language Barriers in the U.S. Legal System for Primarily Spanish Speakers:
Attorney Perspectives and Potential Solutions for True Equal Access

has been approved as meeting the thesis or project requirement for the Designation
University Honors with Distinction

Approved by:

Dr. Kimberly Baker, Honors Thesis Advisor

Dr. Jessica Moon Asa, Director, University Honors Program

Abstract

The U.S. legal system is difficult to navigate for anyone who is attempting to use it, but non-English-speaking individuals have a unique set of obstacles to overcome. Communicating and understanding legal jargon and processes can become increasingly strenuous when one does not speak English in a predominantly English system. This study is specifically focused on the barriers that Spanish-speaking clients face and potential ways to change the system in order to make the experiences of non-English speakers more accessible. By interviewing attorneys who work with both English and Spanish speaking clients, we gain insight into their perspective on issues they face with their clients. After analyzing the four attorney interviews, we find that dialectical translations, attorney-client relationships, and technological advances from COVID can affect language barriers that Spanish-speaking clients face.

Introduction

Purpose

Although the US does not have an official language, legal documents are only guaranteed to be available in English. While interning at an immigration law office, I saw numerous clients who only spoke Spanish, and in order to go through the legal process, there were forms that needed to be filled out in English. Our legal assistants were fluent in Spanish, so they were able to translate the documents, but each page translated cost \$50. Spending \$50 per page can quickly add up, especially when a client has a long legal process that spans months and even years. The lack of non-English legal documents is just one issue that non-English speakers face when they interact with the U.S. legal system.

This study is designed to further explore interactions between English-speaking attorneys and their Spanish-speaking clients. To contextualize the need for this study, the discussion that follows reviews the literature focusing on non-English speakers and the process that they go through when utilizing the legal system. First, I outline the precedent that is set in legislation and policies regarding the use of language in the legal system. Second, I show the language barriers that are still present for non-English speaking individuals in the justice system. Third, I focus specifically on articles that investigate the experiences of attorneys who regularly work with non-English speakers in the legal system. These attorneys have the background knowledge to understand how these individuals *should* be treated while seeing language issues nevertheless occurring for their clients. While there is some research already available on attorneys who work with non-English speaking clients, this research generally does not focus on the needs of Spanish speakers. The lack of focus on Spanish speakers is striking because Spanish is the most commonly spoken language outside of English in the US. Therefore, I interviewed English-speaking attorneys who work with Spanish-speaking clients and analyzed the themes that emerged from each conversation.

Literature Review

Precedent Set about Language in the Justice System

For a nation that is advertised as a “melting pot” of cultures and identities, some groups experience a lack of access to certain systems within the country. Throughout much of U.S. history, the justice system was a difficult branch for some individuals to utilize because there was no precedent for non-English speaking individuals, or LEPs. An LEP is a person who has limited proficiency in reading, writing, or understanding English because they have a different primary language (Barak, 2021; Davis & Isaacson, 2017; Morales & Wong, 2005; Vernon, 2011). Unfortunately, it took mishaps in LEP legal cases to include policies that protect the rights of these individuals.

The situation improved for LEPs through Title VI of the 1964 Civil Rights Act, which states that there can be no denial of access to the benefits granted by federal funding with specific inclusions for language discrimination as a form of national origin discrimination (Davis & Isaacson, 2017). There have also been Supreme Court cases that have granted more language-based rights. For example, *Negron vs. State of New York* (1976) says a Spanish-speaking criminal defendant is entitled to an interpreter, otherwise the trial is unconstitutional (Davis, 1985). Though this is an important precedent, it only applies in criminal cases.

Immigrants also have constitutional rights no matter their legal status. The most pertinent constitutional rights for our purposes come from the Fifth, Sixth, and Eighth Amendments. These give them the right to counsel, right to due process, equal protection under the law, protection from self incrimination, and protection from cruel and unusual punishment (Chin, 2009). Even with these established constitutional rights, immigrants tend to have additional issues within the justice system, especially when they do not speak English.

Language Barriers Faced by LEPs

Though there are laws and precedent in place intended to bring justice to all who go through the legal process, there are still barriers to accessing that justice for LEPs. As Ryo and Humphrey (2022) articulated, an immigrant's ability to speak the prominent language in the legal system, i.e. English correlates with their civic engagement and their access to public services. For example, immigrants who do not speak English have a lower rate of obtaining legal representation than those who are proficient in the English language (Ryo & Humphrey, 2022). Access to interpreters can become a financial issue. It is a requirement in the U.S. for all criminal defendants to have an interpreter, but it is not necessarily a requirement in civil cases which can include adoption, divorce, contract agreements, or one party suing another (Morales & Wong, 2005). Because an interpreter is not required in these cases, these clients have to find a suitable one and pay them, which can be difficult for someone already paying numerous fees for their representation.

Some may assume that in order to fix these issues of language barriers and a lack of representation we should have more attorneys who can speak the language of their clients. Though increasing the number of second-language speaking attorneys may help general communication, there are numerous complications that arise if the attorney is the interpreter of their client. Attorneys may understand the language of their clients, but they still may have a lack of confidence in their ability to translate well enough (Barak, 2021; Morales & Wong, 2005). There is also the issue that attorneys who are interpreting for their client are spread thin trying to translate and litigate at the same time. Their interpretations then become conflicts of interest (Morales & Wong, 2005). This shows that fixing language barriers is not as simple as hiring attorneys that learned Spanish as a second language because acting as both an attorney and the interpreter can interfere with how well they represent their clients.

A barrier related specifically to Spanish speakers is which dialect the interpreter speaks. The Spanish language has wide variation depending on what country or region the

client is from. Moreover some dialects use a different vocabulary or have a specific accent. Because of these differences, there are potential miscommunication issues. The clients may not fully understand the context or connotation of whatever the interpreter is saying, and there may be an issue of the interpreter not fully understanding the client. In this case, there are worries of clients being painted as evasive or inarticulate when there is simply a difference in the translation (Barak, 2021; Vernon, 2011). When dialects get involved, it becomes an issue of ensuring that there is true understanding from the client's perspective.

Attorney Perspectives

While the focus so far has been on the experiences of LEPs, it is valuable to consider the attorneys' perspectives to understand the obstacles they see with their clients. Attorneys have a valuable perspective because they know the law and the rights of individuals who interact with the system. In addition, they interact with clients who may not be proficient in the English language. Immigration attorneys and public defenders alike find many issues within the justice system for immigrants who are detained, and many of these issues stem from language barriers.

Chin (2009) specifically focused on Immigration and Customs Enforcement (ICE) detention centers. Chin found that in detention centers there are language barriers that make it more difficult for the client and their attorneys to speak confidentially. For example, many attorneys need to communicate by phone and these calls are supposed to be free and easily accessible. Typically, though, the instructions to use the phone are only in English, making it difficult or even impossible for some clients to understand. This problem is potentially enhanced because attorneys report that there is a lack of interpreter access for their clients. One attorney claimed that no one in the staff is able to speak Spanish, so their clients who only speak Spanish are unable to access programming and treatment in the detention center (Chin, 2009). If there is no one in the facility who has the ability to speak Spanish, one of the

most widely spoken languages in the United States, there may be reason to be concerned for immigrants who speak less common languages.

The technological issues addressed by the attorneys focused on the ICE detention centers was corroborated in Barak (2021), who interviewed immigration attorneys and focused on language barriers, both general and related to technology used in the justice system. The author of the article conducted 18 semi-structured interviews with immigration attorneys because they are “particularly well-positioned to assess matters of fair process in the immigration system” (p. 212). These interviews addressed general language barriers mentioned by most articles within the existing literature such as dialectical differences and lack of access to interpreters. The attorneys also described potential struggles they face when they are unable to speak the language of their client or confidently speak the language well enough to translate in a court of law. Furthermore, Barak found problems in technological advances in the courtroom such as phone calls and videoconferencing when interpreters are needed. With this technology, there are increased difficulties for interpreting the connotation of the situation and for interpreting the body language and vocal delivery of the LEP.

Research Question to Be Answered

Barak’s research lays the foundation for this current study. Barak’s reliance on in-depth interviews with attorneys provides a deeper understanding of the situations commonly experienced with clients that do not speak English. Notably, though, Barak does not focus specifically on Spanish speakers. In the US, Spanish is the second most frequently spoken language with approximately 40 million speakers, many of whom learn English as a second language. Because of the large number of Spanish speakers in the US, one might assume that Spanish speakers have the most accommodations within the legal system, but it seems like even their access is lacking. From Barak’s study, it is also clear that attorneys with extensive experience in the justice system are uniquely positioned to witness language barriers that

LEPs face while also understanding how the legal system works, so they have the ability to imagine possible solutions that would materially improve LEPs access to justice.

This study seeks to build on the work of Barak and others who have studied LEPs by focusing specifically on attorney's interactions with Spanish speakers. Through in-depth interviews with attorneys, I further explore the distinctive needs and experiences they have with clients whose first language is Spanish. The guiding research question for this study is:

- What problems do attorneys encounter in working with Spanish-speaking LEPs?

Methodology

In order to gather a better understanding of the use of the Spanish language in the criminal justice system, I conducted 4 semi-structured in-depth interviews with attorneys who practice law in Eastern Iowa who have worked with clients who primarily speak Spanish. I have chosen to conduct qualitative research in the form of in-depth interviews because speaking directly with someone who has experience in this area will enable a deeper exploration of language dynamics within the criminal justice system and how they have interpreted these perceptions (Weiss, 1995). I have chosen to interview attorneys because they fully understand the legal system and how it is intended to work, so they will be able to recognize the differences in treatment and outcomes for clients who primarily speak a different language, i.e. Spanish. Barak (2021), who conducted interviews of attorneys (specifically immigration attorneys), found it important to interview these professionals because they are not very present in current literature despite having "intimate knowledge" of the legal process for immigrants and whether their treatment is fair (p. 212). After reading this article, I thought it would be important to further explore more perspectives from this professional group.

In order to find attorneys to interview, I used the snowball sampling method. This is a method where the researcher knows someone in the population you want to study and after interviewing them, you ask for a referral and that referral can provide further referrals (Weiss,

1995). My faculty advisor gave me the names of some attorneys in the areas, so I started by reaching out to them first. Then from there, I asked them to recommend other attorneys. Three of the attorneys that agreed to an interview were from the same organization that worked in immigration, but they were not from the same office. One of the attorneys I interviewed is the lead public defender in an eastern Iowa county.

After receiving IRB approval in January (IRB-FY24-139), I began the snowball sampling method in February. Interviews were scheduled in late February and early March and were conducted by Zoom. Attorneys who agreed to participate completed a consent form to ensure their understanding of the terms of the interview and grant knowledgeable consent to participate. The interviews were recorded and uploaded to Otter.ai to create the initial transcript. I then carefully edited the transcripts. During editing, the interviewees were de-identified and assigned pseudonyms to protect their confidentiality.

To analyze the data, I conducted a content analysis of the transcripts from a grounded theory perspective (Charmaz, 2006). I engaged in initial coding, inductively identifying three main themes that emerged from the interviews: dialects and translation issues, cultural differences between attorneys and clients, and COVID's effects. I carefully coded all three transcripts at the sentence level for these themes. I then analyzed the coded sentences occurring within each theme.

Findings

Dialects and Translation Issues

The first prominent recurring theme that was touched upon in each interview was how there are numerous opportunities for mistranslation amongst attorneys who work with Spanish-speaking clients. Each attorney spoke about the availability of interpreters and how different dialects can affect availability. As mentioned in previous research (Barak, 2021; Vernon, 2011), different dialects of a language can open up avenues for miscommunication

because though the client and the interpreter/attorney may speak the same overarching language, there are numerous different connotations of words and phrases that do not always fully represent the situation at hand. This showcases how difficult it can be to obtain an interpreter that facilitates true understanding for the client. Sometimes a lack of interpreters for a particular situation will turn the attorney towards community members or relatives of the client. This can potentially create more translation errors because these are not unbiased certified interpreters.

This issue was spoken upon in-depth in every interview because the attorneys came with the general consensus that their job is to ensure that the client fully understands their case and the outcomes of every action that is taken. Taylor Kaufmann, lead county public defender who has been working in this area for 20 years, emphasized overcoming the language barrier as an attorney:

I assume that my role is to do my best to make sure that the person I'm representing understands what's happening because ultimately, the choices to be made are theirs.

It's the thing that I have to overcome and get to the point where I'm confident, to the best of my ability, that they do comprehend and understand.

From Kaufmann's perspective, we can see that he does not see a language barrier as something for the client to overcome, but rather something that he needs to acknowledge and accommodate. Kae Hoang, the program director of an immigration nonprofit organization since 2016, discussed how she also recognizes that it is the job of the attorney to ensure understanding, so she takes that into consideration while hiring. She focuses on bringing in attorneys that speak Spanish or other in-demand languages. Hoang also works on getting volunteer interpreters the training they need to understand confidentiality and the complexities of being a legal interpreter. However, even with the ability to speak Spanish, Elizabeth De la Cruz, another immigration attorney, talked about how she communicates in

the same language as clients but has to use different tactics such as drawing diagrams or using colloquial language to make sure the clients understand.

Additionally, the attorneys spoke about translation difficulties that occur when a client is from a Spanish speaking country, but their native language is an indigenous language and the Spanish they speak was picked up second hand. Peeta Schmitz, a nonprofit immigration attorney, spoke about a case where the interpreter speaking Spanish was not able to ensure understanding because the client's first language was Ixil, an indigenous language in Guatemala. Because the immigration office did not have an Ixil interpreter on call, they had to utilize family members as interpreters. He discussed how using family members as translators can bring in a new set of issues because now the client has to be comfortable to share all background information and facts of the case with family. Due to this new dynamic, confidentiality becomes an issue. Problems with bias also become an issue because family members oftentimes have some sort of stake in the case. Schmitz described how he was apprehensive about a case where a woman from a South American country wanted her mother to stay in the country and provide childcare, and the daughter was willing to translate for her mom:

Yes, you're perfectly fluent in English and perfectly fluent in Spanish, but I'm not comfortable, necessarily. When I say, "your wait can be up to one year, you should not depart the United States until you have your green card if you continue to want to pursue your green card." Did the daughter just say to the mother, "the attorney is saying that you should not depart under any circumstances because you need to remain in the United States." I mean, there's a difference there. She wants her mom to stay, she's got a horse in this race. And that's an example of when somebody might have a motivation not to screw around with what I'm saying, but just to cast things in a different light, which it's very easy to do.

Hoang echoed this reluctance to use family as interpreters because she herself had to translate for her mother when she was a child and they came into the United States. She looks back and understands that translating as a child put her in an awkward position as she translated sensitive and sometimes traumatic situations, so her focus is to utilize neutral third party unbiased interpreters.

These experiences from attorneys describing potential mistranslation and overall misunderstanding corroborate with prior research on language barriers and expand upon the issue of utilizing family members as interpreters. It is not as simple as having people who can speak both English and Spanish. The ability to both recognize when someone is not grasping the legal concepts being explained and find a new way to elucidate this concept is a requirement. This ability comes from legal training and significant experience in interpretation. Even attorneys who speak Spanish themselves need to understand when different terms are necessary for the client to understand. There is also the potential for clients to gain slightly different advice if there is a family member interpreting because they are a biased party in the case. All of these attorneys were adamant about their role to facilitate understanding for their clients, but they were also cognizant of the many ways things get lost in translation.

Cultural Differences that Affect Attorney-Client Relationships

Another theme that emerged in these interviews was the cultural difference between attorneys and Spanish-speaking clients. Unfortunately, there is little existing research on how established legal relationships and trust between attorneys and LEP clients affect the individuals from this community and their utilization of legal services. However, based on my own education of Spanish-speaking communities and the experiences of the attorneys interviewed, there may be a correlation. It was found in prior research that being able to speak English correlates with civic engagement and the ability to find legal representation

(Humphrey, 2022). It would be interesting to look deeper into how positive relationships within the legal system may impact Spanish-speaking clients' interactions with the legal system. It was found that clients from typically Spanish-speaking countries have a sense of distrust with the legal system in the United States and that they are more trustworthy of an attorney who speaks their language.

Kaufmann did not believe there was a major issue with creating a relationship with his Spanish-speaking clients because the relationship is already established through his representation. However, he did also state that the frequency of contact with Spanish-speaking clients might decrease because he has to schedule around an interpreter:

You know, I'll sit and joke with my clients or talk about things other than the case and things like that. But that happens. It doesn't happen as much if you need an interpreter for those types of interactions. You know what I mean? So, I don't know that the depth of the relationship gets established because of that language barrier.

Essentially, he does not believe that his work relationship is jeopardized by the language barrier because he is going to do his job no matter what, but the language barrier might hinder a more personable relationship to form. There might be a need for a deeper connection with these Spanish-speaking clients and their community, because as Peeta Schmitz stated in the interview, there is a certain need for trust with these clients:

They [Spanish speakers] want to access our legal service, but they also just want to kind of keep their heads down and stay out of the view of any authorities. So you really need, you know, a go between who's active in these communities that's gained their trust to be able to provide services.

Trust here seems to be an issue that would affect whether or not this community seeks legal services, and as Elizabeth De la Cruz, the Spanish-speaking immigration attorney that works

both in eastern Iowa and a South American country, said, hearing their own language is a major way to gain trust. “People feel very relieved when they realize that the attorney speaks the same language. You can literally see their body relax.” This visual representation of relief may showcase the apprehension Spanish-speaking clients feel knowing they might be faced with a language barrier.

These interviews showed that a language barrier is a possible factor that strains the relationship between the attorney and the client. This lack of trust with the legal system may decrease if the Spanish-speaking clients had more interaction with people who understand their culture and their language. It would be interesting to do future research to see how interacting with an attorney who speaks Spanish affects the Spanish-speaking client’s likelihood to continue engaging with the legal system and recommending other Spanish-speaking people to utilize these services.

COVID’s Effect

The final theme that is a timely topic was how COVID and the technological advances from 2020 affected working with Spanish-speaking clients. These interviews diverged from previous research and found that technology from COVID actually had a positive impact on working with these individuals. Previous research showed that using interpreters on phone calls or videoconferencing created more issues with interpreting the context of the situation (Barak, 2021). The attorneys interviewed had a more positive outlook on the technological advances like Zoom and WhatsApp that blossomed because of the pandemic.

When asked about how COVID impacted working with Spanish-speaking clients, all of the attorneys held the sentiment that the move to Zoom and phone calls made communication easier. Taylor Kaufmann discussed early on in the interview that his office has one official interpreter that works for them, so it is difficult to schedule this interpreter

and meet with every client. However, with Zoom, it made it a bit easier to schedule meetings with an interpreter because location was not an issue. “With the scarcity of interpreters and them needing to be in five places at once, you can sit in your living room and be in those five places within a matter of minutes each time.” Because everyone is working from home, there is no worry about driving from location to location, so the interpreter for the office can schedule more appointments a day. There is also a greater chance of meeting with another interpreter who might not be in the area. Peeta Schmitz acknowledges a common misconception that immigrants might struggle more with technology and having access to these virtual meetings, but that was not the case for his clients.

You would think that perhaps immigrants, especially those who are waiting for documentation, or in some kind of a holding pattern, or Spanish speaking and maybe can't access things in the United States, would be harmed more by having to move to doing things remotely. But actually, I think they fell into that really well, because they're already using WhatsApp to talk to relatives back home.

Because his clients tend to have family in a different country, they easily adapted to hearings and appointments switching to online services and apps. These are skills they have already become accustomed to.

It is important to remember that all of these attorneys are practicing in the state of Iowa where interpreters are a difficult commodity to obtain, so that could be an explanation for why there were such differing opinions on using Zoom calls and WhatsApp messages. Technology made interpreters more accessible. It also highlighted a skill that Spanish-speaking communities and immigrant communities already had established before COVID was a reality for the entire world. It should also be noted that these attorneys focused more on practicality of these applications whereas the previous research seemed to be more focused

on effectivity of using video and phone calls more, so it might be beneficial to look into how the practicality of utilizing technology compares to the effectiveness of using these online tactics for Spanish-speaking clients who need interpreters.

Conclusion

This study showed that language barriers do exist, but the situation is not as dire as I expected. The resounding sentiment across all of the interviews with the attorneys is that they view themselves as responsible for doing everything in their power to ensure Spanish-speaking clients understand. Rather than force the clients to shoulder the burden of the language barrier, the attorneys are adamant about using the resources and knowledge they have acquired through their experience. These interviews showcased how numerous factors affect language barriers such as access to and availability of trained legal interpreters, the attorney-client relationship, and the technology available.

This study was limited by the time constraint of the project at hand. This thesis was designed to take place over one academic year. If I had more time, I would have liked to interview more attorneys from different areas of Iowa and the United States as a whole. With my interviews covering eastern Iowa, I have a good understanding of the language barriers in this specific region. If I had been able to interview attorneys from across the country, I would have gained a more comprehensive picture of the barriers obstacles Spanish speakers face in the U.S. Legal System.

Further research that specifically looks at how established relationships between attorneys and clients affect the Spanish-speaking community and their trust of utilizing legal services would be interesting to collect data on. It might also be beneficial to look at the practicality of using technology such as Zoom versus the effectiveness of using this technology. Overall, there is a lot of research done in this area, but plenty more can be explored. Continual research must be done to explore the intricacies and complexities that

Spanish speakers face when interacting with the legal system. If we are able to acknowledge and understand the language barriers that non-English speakers face in the U.S. Justice System, we are one step closer to mitigating these barriers. This allows us to work towards a more inclusive system that hopefully will one day encompass true and equal access for all who use it.

Literature Cited

- Barak, M. P. (2021). Can you hear me now? Attorney perceptions of interpretation, technology, and power in immigration court. *Journal on Migration and Human Security*, 9(4), 207–223. <https://doi.org/10.1177/23315024211034740>
- Charmaz, K. (2006). *Constructing Grounded Theory: A Practical Guide Through Qualitative Analysis*. SAGE.
- Chen, M. H. (2014). Governing by guidance: Civil rights agencies and the emergence of language rights. *Harv. CR-CLL Rev.*, 49, 291.
- Chin, J. (2009). *Attorneys' Perspectives on the Rights of Detained Immigrants in Minnesota* [PhD Thesis, University of St. Thomas]. <https://lawprofessors.typepad.com/files/final-cura-article-11-10-09.pdf>
- Davis, L. W., & Isaacson, S. A. (2017). Ensuring equal access to justice for limited English proficiency individuals. *Judges Journal*, 56(3), 21–27.
- Davis, R. C., Erez, E., & Avitabile, N. (2001). Access to justice for immigrants who are victimized: The perspectives of police and prosecutors. *Criminal Justice Policy Review*, 12(3), 183–196. <https://doi.org/10.1177/0887403401012003001>
- Davis, W. E. (1985). Language and the justice system: Problems and issues. *The Justice System Journal*, 10(3), 353–364.
- Morales, T. B., & Wong, N. D. (2005). Attorneys who interpret for their clients: Communication, conflict, and confusion-how Texas courts have placed attorneys and their LEP clients at the discretion of the trial court. . . *Mary's LJ*, 37, 1123.
- Moya, S. (2021). Language barriers and cultural incompetency in the criminal legal system: The prejudicial impacts on LEP criminal defendants. *Fordham Urb. LJ*, 49, 401.
- Ryo, E., & Humphrey, R. (2022). Beyond legal deserts: Access to counsel for immigrants

facing removal. *NCL Rev.*, 101, 787.

Shah, S., Rahman, I., & Khashu, A. (2007). Overcoming language barriers. *Solutions for Law Enforcement*, 1–17. *The Art and Science of Social Research*. (n.d.).

Vernon, K. H. (2011). No se habla Espanol: Ethical and practical considerations for non Spanish-speaking attorneys representing Spanish-speaking clients. *JCR & Econ. Dev.*, 26, 223.

Weiss, R. S. (1995). *Learning From Strangers: The Art and Method of Qualitative Interview Studies*. Simon and Schuster.