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Honorable \_\_\_\_\_\_\_\_\_\_\_\_\_

### Courthouse**Street**

City, State

Dear Judge\_\_\_\_\_\_\_:

Attached you will find a (20) twenty copy of my ***Amicus Brief in opposition to giving weight to a child’s wishes and opinions with respect to the parenting plan, the residential preference, the structuring of the relationships with the parents, or in parental disagreements in situations when—after a proper assessment for suggestibility—there is a finding that the child had been influenced/programmed to align with one parent against the other.***

To that end, this Amicus Brief is intended to educate the Court with the current clinically and scientifically accepted knowledge about the psychological, cognitive, and interpersonal needs of children who are experiencing this harmful family phenomenon.

I am addressing the commonly occurring clinical issues occurring in cases of high parental conflict and the consequent harmful effects on children. I trust the information herein documented will be helpful to the Court in rendering its rulings on the case.

My expertise in educating the Court about such matters is based upon my history of more than fifty (50) years of professional education, training, and experience in evaluating and/or treating 5000 children and their families in a variety of settings *and* based upon my specialization in assessing and/or treating for more than twenty (20) twenty years of the (50) fifty years children experiencing their parents’ adversarial custody battles. I hope that my opinions will carry weight in Your Honorable Court.

I confirm that, at the time of my signing this Amicus Brief, I have not been requested to testify—either case specifically or generically—on behalf of either party. I do not know any specifics in this matter, and I am therefore not opining about the specific family dynamics in this case or whether alienation is or is not present. I am merely attempting to educate the trier of the facts regarding an issue or issues in question in the hope that the information provided enables the Court to render decisions in the “Best Interests of the Child.” I further declare that I have not been paid to sign this Amicus Brief.

I do not, however, preclude the possibility that, at some future date, I could become an expert witness if so requested by one of the Parties upon having independently determined that the Party is acting in compliance with the standard of The Best Interests of the Child.

Should, at the time of the hearing, I need to be contacted for any clarification or confirmation of what I have submitted herein, my phone number is (347) 454-8840, and I would be more than happy to telephonically or remotely teleconference, under Oath, and opine about relevant questions Your Honor would require of me.

Respectfully signed and submitted in the case of ***Plaintiff v Defendant***

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| **Case NO:** |
| Plaintiff v Defendant |
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| ***Amicus Brief in opposition to giving weight to a child’s wishes and opinions with respect to the parenting plan, the residential preference, the structuring of the relationships with the parents, or in parental disagreements in situations when—after a proper assessment for suggestibility—there is a finding that the child had been influenced/programmed to align with one parent against the other.*** |
|  |

Honorable \_\_\_\_\_\_\_\_\_

### Court House**Street**

City, State

**Declaration of Linda J. Gottlieb, LMFT, LCSW-R**

Dear Judge\_\_\_\_\_\_\_\_\_\_\_\_:

My name is Linda J. Gottlieb, LMFT, LCSW-R, and I am writing thisAmicus Brief in opposition to giving weight to a child’s wishes and opinions with respect to the parenting plan, their residential preference, the structuring of their relationship with their parents, or parental disagreements in situations when it is alleged that one parent is unduly influencing the childagainst the other parent. There is a high probability that interviewing the child and giving weight to their wishes and opinions about these matters places them at risk.

Should the child have been unduly influenced by one parent in order to gain an upper hand in the family matters before the Court, then the parent is most probably subjecting the child to the “loyalty conflict.” The loyalty conflict is defined by the American Professional Society on the Abuse of Children (APSAC) as a caretaker abusive behavior known as “terrorizing” the child. APSAC defines the “loyalty conflict” as “making the child unnecessarily choose to have a relationship with one parent or the other” (p. 148).

It is therefore necessary, in cases when undue influence on the child is alleged, that an *expert* in the suggestibility of children be assigned—before giving weight to the child’s wishes and opinions—in order to assess the child to rule out any undue influence. Ruling out for undue influence is in compliance with the standard of the “best interests of the child” on two grounds: First, subjecting the child to the loyalty conflict is a form of child psychological abuse—and it is settled science about this. Second, the child who is subjected to the loyalty conflict can no more express independent wishes and opinions separate from those of the influencing/brainwashing parent than can a cult member be expected to express feelings, wishes, and opinions separate from those of the cult leader. This is also settled science.

There are numerous reasons that a minor child—and especially an unduly influenced minor child—is incapable of making rational decisions and decisions in one’s best interests and may not be freely and competently reporting her or his genuine wishes, feelings, and opinions:

***First,*** the same rationale applies to not giving weight to the opinions of a minor child that apply to the requirement for jury members to be at least 18 years of age: Research confirms that our cognitive development does not mature until the early 20s! Children, in general, therefore do not have the cognitive capacity to make appropriate decisions for themselves. And an unduly influenced child is almost surely unable to evaluate what is in their best interests or to theorize what it would mean to have a parent marginalized, minimized—and, in some cases, eradicated from their lives. Unduly influenced children are unable to discriminate what is rational, truthful, meaningful, and moral amidst all the information they receive from a programming parent. Minor children lack wisdom. An unduly influenced child almost surely lacks reality testing and suffers from diminished emotional and cognitive capacity.

It is not in the best interests of children to delegate to them the responsibility for making momentous and complex decisions beyond their emotional and cognitive capacity to handle. We would not ask a child, "How often do you plan to attend school?" "Are you willing to comply with medical treatment?" “Have you determined your dietary habits?” “Would you consider relinquishing your use of illegal drugs?” We should not, as the professionals who are specially appointed or entrusted to intervene in these difficult, traumatic cases of adverse custody, to abrogate our professional responsibility by giving weight to the voice of a minor child—influenced or not—in such a critical areas as family relationships, especially regarding the relationship with a parent and other family decisions.

***Second***, there are substantial peer-reviewed research studies and informed knowledge acquired from evidence-based practices regarding the suggestibility of children and the astonishing ease of implanting false memories in children—even of having been physically and sexually abused. For example, research studies by psychologists Julia Shaw (2017) and Elizabeth Loftus (1999, 2000) determined that false memories can be implanted in children, college students, and in adults by the third weekly interview. Julia Shaw’s research—which has been many times replicated—informs that she was able to implant the false memory in more than 70% of college students that they had committed a crime in adolescence!

Maggie Bruck and Stephen Ceci (1999) have extensively summarized the research on the suggestibility of children to adult influences. They concluded that:

When children are repeatedly and suggestively interviewed about false events, assent rates rise for each interview. For example, children are more likely to assent to a false event in a third interview than in a second interview. Subtle suggestions can influence children’s inaccurate reporting of nonevents that, if pushed in follow-up questioning by an interviewer who suspected something sexual had occurred, could lead to a sexual interpretation.

Bruck and Ceci further emphasized that children can sound quite “credible” in their reporting of nonevents but which had been suggested by the interviewer. (P. 432.)

The false memories in the above studies were implanted in these children by strangers. Just imagine the ease with which a parent—upon whom the child is dependent for love, nurture, support, approval, and survival and who has unfettered access to the child—can manipulate the child to adopt and then repeatedly mimic that parent’s wishes, beliefs, and feelings—as if they belonged to the child.

Having been informed by my evidenced-based practice focused on high conflict custody cases since 2003, what is particularly alarming in these cases is the frequency of one parent *knowingly making* a false child abuse or child sex abuse allegation against the other parent and manipulating the child to confirm the allegation. In these cases of undue influence, I have repeatedly observed the children to mimic the beliefs, feelings, and wishes of the parent who had used her/his parental authority to thusly program and brainwash the child to reject the other parent, align with the programming parent, and confirm the false child abuse allegation(s), Yet, despite this, research confirms that the prevalence of sex abuse occurring in high conflict custody cases is <2% while false allegations of sex abuse occurring in high conflict custody cases may be as high as 35% (Davis, 2017).

Children do not have the emotional capacity and wherewithal to contradict, resist, and defy a parent who is using undue influence over them. And when the influence is designed to turn the child against the other parent, it becomes a malicious and abusive act. Countless professionals who work in the area of custody disputes have observed and written extensively about the undue influence of some parents who are determined to sever the relationship between the other parent and their child and brainwash and manipulate the child to participate (Harman, 2023; Lorandos & Bernet, 2020; Clawar & Rivlin, 2017; Judge & Deutsch, 2017; Warshak, 2015, 2003; Reay, 2015; Baker & Fine, 2017, 2013; Miller, 2013; Gottlieb, 2012; Kelly & Johnston, 2001; etc.).

I elaborate here on one of these studies which documents the prevalence in adversarial custody cases of one parent’s undue negative influence over the child with respect to the other parent. I am referring to the 2013 book published by the American Bar Association entitled, *Children Held Hostage: Identifying Brainwashed Children, Presenting a Case, and Crafting Solution.*  The authors, Clawar and Rivlin, followed 1000 children of high parental conflict for more than 30 years and reached the finding that some degree of what they labeled as “programming/brainwashing” occurs at least weekly in 86% of these cases (p. 420, Table 17.)

Specifically, in cases that have reached the point of an adversarial Court custody proceeding, a professional must have been *specifically* trained in the suggestibility of children in order to differentiate the child's genuine wishes, opinions, and feelings from those of a parent who had been engaging in undue influence to turn the child against the other parent and seek the child’s alignment in the custody battle.

***Third***, unduly influenced children of adversarial parental conflict are trapped—that is, trapped between their genuine feelings of love and need for the marginalized/rejected parent on the one hand and by the disapproval, provoked guilt, and criticism of the programming parent should the child dare to express any positive feelings and need for the marginalized/rejected parent. These children are victims of the loyalty conflict whereby programming parents are abusively, selfishly, and insensitively manipulating their children to align with them.

Children *do not* welcome a choice to favor and support one parent over the other—an assumption we make when we decide to inquire of them about their wishes and feelings in a custody dispute. Children naturally shun making such a choice between parents (Andre & Baker, 2009). But an influenced child has to go along to get along with the programming parent.

A red flag for the programming should immediately go up when we encounter a child who perceives her or his parents in black and white/all or nothing terms. This is *not* normal childhood behavior. It is anti-instinctual to reject/resist a parent—even an abusive parent. Because of our long dependency period—and for psychological reasons as well—it is part of the instinct for survival to want and need a parent. I discovered this in my 24-year work with 3000 adjudicated abused/neglected children in New York’s foster care system. I cannot think of a child in this population who had utterly, definitely, and inflexibly rejected a parent.

In addition to my evidence-based practice regarding how abused children bond to their abusive parents, there is extensive peer-reviewed research on this finding. (Warshak, 2015, Reay, 2015, Gottlieb, 2012, Bernet, 2013, 2015; Lorandos & Bernet, 2020).

An impressive 2019 research study, for example, entitled, “The Assessment of the Attitudes and Behaviors about Physically Abused Children: A Survey of Mental Health Professionals” (Baker, Bernet, Miller, & Adebayo), published in the *Journal of Child and Family Studies,* found that an estimated 17,500 moderately to severely physically abused children sought attachment enhancing behaviors to their abusive parents. The research further revealed that the greater the abuse, the stronger was the children’s attachment to and yearning for their abusive parents. Some of the study’s findings were:

Physically abused children were reported to want to maintain relationships with abusive caregivers.

Several notable findings emerged from the current study. First, as hypothesized, abused children were reported to exhibit statistically significantly higher levels of attachment-enhancing behaviors than attachment-disrupting behaviors.

Thus, as a group, the children were rated as expressing more of the behaviors identified as preserving the relationship than behaviors that could disrupt it.

Therefore, despite being physically maltreated by a parent—some severely—the over 17,500 children reported on in general and the 166 children reported on specifically were noted to engage—for the most part—in behaviors that foster feelings of closeness with the maltreating parent such as caring about the parent’s feelings, taking that parent’s side in conflicts with other people, expressing realistic complaints, seeing both good and bad in the maltreating parent, maintaining relationships with the family of the maltreating parent, being invested in the relationship, and being able to recall positive memories. Physically abused children were noted to behave—for the most part—in ways that were likely to express love, care, and concern for a parent and to elicit love, care, and concern in return. Moreover, it was reported that such children did not engage in behaviors that were likely to disrupt their attachment or activate rejection from their caregivers. For the most part, the abused children were not described as behaving in a rude or unkind manner toward the caregiver, refusing contact with the parent, expressing weak reasons for their hurt or anger, idolizing the other parent, being persistently negative, not caring about the parent’s feelings, denying negative influence from others, and being angry at the caregiver’s family.

A second notable finding is that clinician ratings of the severely abused children were not significantly different than the ratings of the moderately abused children.

The findings of this study were preceded by the same findings of a smaller study by Baker and Schneiderman (2015) documented in their book, *Bonded to the Abuser*.

***Fourth,*** on some level these programmed children recognize—perhaps not until adulthood—that they had unjustifiably and cruelly rejected and maltreated a parent. Baker and Fine (2007) found that, as adults, this population suffered profound long-term guilt and higher rates than the general population for depression, anxiety, drug abuse, and interpersonal conflicts from having a parent absent from their lives. And if the rejected parent is no longer living or available when the child attains this understanding, it is impossible to make amends and thereby assuage their punishing guilt.

***Fifth,*** emotional cutoff is a profoundly unhealthy way to resolve interpersonal conflicts—especially with a parent. The long-term consequences to the child from the loss of a crucial parental relationship—and usually the relationships with all of the rejected parent’s extended family—is an incalculable loss. It is profoundly unhealthy for a child to linger with anger and negative feelings and perceptions for a parent. A child’s self-esteem, just for starters, depends upon the perceptions of parents. Time and again children are sent to therapy to address anger issues expressed in the classroom; parents voluntarily bring their child to therapy when anger is inappropriately handled with peers; and judges repeatedly order juvenile offenders to obtain anger management counseling to mitigate their anger. So why would we permit a child to remain with anger and hatred for a parent—who is so meaningful, irreplaceable, and impactful to the child’s short and long-term functioning?

In my professional opinion, we will merely be waiting for the smoking gun if we allow a child to remain with unresolved anger and hostility for a parent and ultimately to reject the parent. And to state the obvious, the child’s anger must be addressed and resolved through interactions with the rejected parent. Anger cannot be resolved by permitting the severing of the relationship between parent and child. If a child is permitted to disrespect and defy a parent, the child will, furthermore, inevitably transfer this way of relating to all authority and intimate relationships.

***Sixth***, I have repeatedly experienced children who had rejected/resisted contact with a parent to suddenly *flip as quickly as a light switch* from rejection to enthusiastic embracement of the maligned and rejected parent as soon the programming parent frees the child from the abusive loyalty conflict. The child’s rapidity of a 180 degree change in attitude towards and interactions with the rejected parent is evidence of the programming parent’s influence and power over the child; the 180 degree change is further evidence of the spuriousness of the child’s *expressed* hatred for, fear of, and resistance to the rejected parent. This phenomenon reflects one of several counterintuitive issues arising in these cases: because programmed children do not say what they mean or mean what they say, they cannot be taken at their expressed word. When freed from the loyalty conflict either by the programming parent or by the Court, the child’s repressed desire for and love of the rejected parent is allowed to emerge.

***Seventh,*** household dysfunction, including inflicting the loyalty conflict on the child, is an example of an Adverse Childhood Experience (ACE) which creates both short and long-term harm to the child across the emotional, cognitive, interpersonal, behavioral, and physical domains. I cite below only a fraction of this research:

1. Felitti, V. J. et al. (1998) in “Relationship of Childhood Abuse and Household Dysfunction to Many of the Leading Causes of Death in Adults: The Adverse Childhood Experiences ” published in *The American Journal of Preventive Medicine*. *14*(4), pages 245- 258. This is a seminal study which stated:

We found a strong graded relationship between the breadth of exposure to abuse or household dysfunction during childhood and multiple risk factors for several of the leading causes of death in adults.

This study focused on fatal complications—death. Other problems such as mental illness and serious physical illness were also found to be greatly increased among children who had experienced ACE’s.

2. Anda,R.F.,Felitti,V.J.,Bremner,J.D.,Walker,J.D.,Whitfield,C., Perry, B. D., . . Giles, W. H. (2006). “The enduring effects of abuse and related adverse experiences in childhood.” *European Archives of Psychiatry and Clinical Neuroscience, 256*(3), 174- 186. doi:10.1007/s00406-005-0624-4

This article makes the critical point that child maltreatment has been linked to a variety of changes in brain structure and function. From the Introduction:

The organization and functional capacity of the human brain depends upon an extraordinary set of sequences of developmental and environmental experiences that influence the expression of the genome . . . Unfortunately, this elegant sequence is vulnerable to extreme, repetitive, or abnormal patterns of stress during critical or circumscribed periods of childhood brain development that can impair, often permanently, the activity of major neuroregulatory systems, with profound and lasting neurobehavioral consequences.

In lay terms, this means that psychological and emotional abuse of children can cause abnormal re-wiring of the brain, which, in turn, can lead to permanent structural damage, functional impairment, and a variety of mental health problems in adult life.

3. Spinazzola, J., Hodgdon, H., Liang, L., Ford, J. D., Layne, C. M., Pynoos, R., . . . Kisiel, C. (2014). “Unseen wounds: The contribution of psychological maltreatment to child and adolescent mental health and risk outcomes. *Psychological Trauma, 6(S1)*, S18-S28. An excerpt from the Discussion section and the key point:

Our findings strongly support the hypotheses that PM *[psychological maltreatment]* in childhood not only augments, but also independently contributes to, statistical risk for negative youth outcomes to an extent comparable to statistical risks imparted by exposure to physical abuse (PA), sexual abuse (SA), or their combination (PA + SA).

Of particular note, this study revealed that the risk factors to the child of psychological and emotional abuse were comparable to the riskof physical abuse and sexual abuse.

4. Nurius,P.S.,Green,S.,Logan-Greene,P.,& Borja,S.(2015). “Life course pathways of adverse childhood experiences toward adult psychological well-being: A stress process analysis.” *Child Abuse & Neglect, 45*, 143-153.

This article makes the point that childhood stress—or adverse childhood experiences (ACEs)—are the major risk factors for future, long-term mental health problems in adult life. The beginning of this paper reads:

Exposure to significant childhood adversity affects a daunting proportion of young people, constituting one of the most detrimental impacts on youth development. Early life adversities include experiences such as maltreatment, neglect, witnessed violence, and household dysfunctions such as parental mental illness or substance abuse . . . Exposure to these events generates step-dose patterns wherein greater exposure to multiple forms of stressful experiences are associated with a wider range of impaired health outcomes, including psychiatric.

And from the conclusion: "Prevention remains a top priority in the realm of child and family welfare and is the foremost implication of early adversity research."

**Clincial literature on the suggestibility of children to parental influence**

**in high conflict custody cases**

When evaluating a child’s behaviors, feelings, and wishes in an adversarial parental battle, it is necessary to evaluate any undue influence that each parent holds over the child. In particularly hostile cases, it is crucial to evaluate the effects of the extraordinary control over a child that a parent may exert in service of that parent’s goal to gain an advantage over the other parent in their custody dispute.

Psychologist and lawyer, Christopher Barden, cautioned the professionals who intervene in such adversarial proceedings that they have a “critical obligation to carefully review the influence of parents, therapists or other adults on the attitudes, beliefs and memories of children.” (p. 420)

The following are the comments of some of specialists in this family dynamic and who have opined about the vulnerability of children to the programming of a parent.

Richard Warshak, Ph.D., in his 2003 peer-reviewed article entitled, “Payoff and Pitfalls of Listening to Children,” cautioned about the vulnerability of children to adverse parental influence over their expressions of feelings and wishes. Warshak declares:

Through a variety of tactics such as selective attention, repetition, intimidation, overindulgence, and suggestion, a parent can corrupt a child’s view of the other parent. Once a child forms a predominantly negative opinion of a parent, and particularly once this opinion is expressed publicly, it is liable to become deeply entrenched and highly resistant to modification even in the face of information that directly contradicts misconceptions. (P. 375.)

Warshak further alerts professionals in a high conflict custody case not to:

delude themselves into thinking that they are hearing a child’s voice when, in fact, they may be receiving a distorted broadcast laced with the static of a charged emotional atmosphere; or the voice may be delivering a script written by another; or it may reflect the desire to placate, take care of, or pledge loyalty to a parent. (P. 382.)

Warshak expressed concern with the “enlightenment rationale” approach to child custody: meaning empowering the child with decision-making status when it comes to custody and the parenting schedule. Warshak opines:

The basic pitfall with the enlightenment rationale is that we will confuse what children tell us with what is in their best interest. Some evaluators, advocacy groups, and parents (particularly those whose children support their position in the custody dispute) assume that children’s words always express their genuine thoughts and feelings, and they equate children’s thoughts and feelings with expressions of their true best interests. That is, children know and are accurate reporters of what is best for them. Proponents off this position believe that a child’s strong preference for or aversion to a parent should weigh heavily in custody decisions. In this view, any child’s rejection of a parent is prima facie evidence of severe maltreatment by the rejected parent. (P. 374.)

A 2013 article by Jaime Rosen entitled “The Child’s Attorney and the Alienated Child: Approaches to Resolving the Ethical Dilemma of Diminished Capacity,” published in *Family Court Review*, was written to educate the Attorney for the Child of the necessity to override the “client centered model” of representation in favor of the “best interests of the child model” in cases of undue parental influence over the child. Rosen argues that the lawyer for the child may substitute judgment if the child client exhibits diminished cognitive capacity as a result of a brainwashing by a parent whom Rosen refers to as the “alienating parent.” In recognition of the brainwashing parent’s influence over the child, Rosen opines:

The ABA *[American Bar Association*] Standards also recognize that children are susceptible to intimidation and manipulation and the child’s decisions may not reflect the child’s actual position…The attorney also has a duty to prevent the child client from pursuing decisions that would not be made but for the brainwashing techniques employed by the alienating parent.

Under the influence of an alienating parent, the child may not be cognitively or psychologically able to make a judgment that is in his or her best interests.

The child’s attorney must determine whether the child’s wishes and statements are an authentic reflection of the child’s attachment with each parent or instead, a result of one parent’s efforts to contaminate the child’s feelings toward the other parent as a result of programming or scripting.

In cases of parental alienation, the parental brainwashing of the child is the true culprit. The child’s opinion is replaced with the desires and objectives of the parent who exercises the most influence over him or her. Further, as more weight is accorded to the child’s stated preferences, the risk of manipulation or pressure by a parent increases. (Pp. 333-334, 336.)

The susceptibility of children to parental influence is not a new phenomenon. But it is not commonly believed that parents, who are presumed to pursue their children’s best interests, could, instead, employ behaviors to use their children as ammunition in a contentious custody battle with the other parent. Nevertheless, the peer-reviewed research and the clinical literature abound with documentation from practices of clinicians and matrimonial attorneys about this all-too-prevalent family phenomenon. And our accumulated knowledge on these cases further informs us of the ease with which children succumb to parental brainwashing and manipulation—to the point of engaging in exceedingly malicious falsehoods about their rejected parents—even involving false child abuse and/or child sex-abuse allegations (Harman, Warshak, Lorandos, Florian, 2022; Joshi, 2021; Harmon, Saunders & Afifi, 2021; Lorandos, 2020; Lorandos & Bernet, 2020; Judge & Deutsch, 2017; Davis, 2017; Bernet, Wamboldt & Narrow, 2016; Reay, 2015; Warshak, 2015; Baker, Bone, Ludmer, 2014; Rosen, 2013; Lorandos, Bernet & Sauber, 2013; Baker & Fine, 2013, 2007; Miller, 2013; Lorandos, Bernet, Sauber, 2013; Gottlieb, 2012; Darnall, 2010; etc.).

My mentor, child psychiatrist Salvador Minuchin, invoked a telling metaphor for a child who is rigidly aligned with one parent against the other parent: to paraphrase Dr. Minuchin, he described the aligned child as the “puppet who mouths the words of the triangulating/aligned ventriloquist parent.”

In summation, it is my professional opinion that the child of high parental conflict and adversarial custody proceedings needs to be extricated from—and not supported in—the unhealthy over-alignment with one parent to the exclusion and marginalization of the other parent. We must shun our customary approach in these situations by *not* giving weight the wishes of a programmed child regarding family relationships, living arrangements, and parenting plans. It is not in the child’s best interests to give uncritical weight to the child’s wishes even if the child had not been influenced/programmed. The reasons for the child’s wishes must be explored and evaluated to determine if the child’s wishes would place the child at risk. For example, children typically prefer the more permissive parent or the parent who plays the victim role and relies on the child to meet the parent’s emotional needs. But it is especially detrimental to programmed children to give weight to their wishes. It must be made the standard practice to rule out for any undue influence by a parent over the child in high-conflict, contentious custody cases before weight can be assigned to the child’s expressed wishes.

The professionals who intervene in contentious custody disputes must, instead, make the decisions regarding family relationships according to—as Rosen opined—the standard of the best interests of the child. We, as the professionals who intervene in these cases, are charged with shielding children from the abusive loyalty conflict and from risk to their health and safety.

We must recognize that the standard for shared parental responsibility and access is in the child’s best interests—just as long as each parent is *fit* and is willing to require and guarantee the child’s relationship with the other parent. It cannot be overstated that brainwashing parents are not fit parents—they are committing child psychological abuse. Determining the parenting plan and primary residence should be decided primarily—if not exclusively—upon an assessment of each parent’s competency, commitment, availability, intentions, demonstrated behaviors to support the relationship between the other parent and their child—and, most importantly, upon the absence abusive behaviors.

Respectfully signed and submitted in the case of ***Plaintiff v Defendant***

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