

LACK OF CHILD PROTECTION IN US CUSTODY

PROCEEDING INVOLVING ALLEGATIONS OF ABUSE

Elle Stoker

FOOTNOTES

1. "Child Custody," *Legal Information Institute*, accessed February 28, 2022, https://www.law.cornell.edu/wex/child_custody.
2. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
3. "Commission to Eliminate Child Abuse and Neglect Fatalities Releases Final Report—Once in a Generation Opportunity for the Administration and Congress to Act to Save Children's Lives," Children's Advocacy Institute.
4. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
5. "Abuse," *Legal Information Institute*, accessed March 7, 2022, <https://www.law.cornell.edu/wex/abuse>.
6. "Allegation," *Merriam-Webster*, accessed December 5, 2022, <https://www.merriam-webster.com/dictionary/allegation>.
7. "Title I—Child Abuse Prevention and Treatment Act," *Authenticated US Government Information*, accessed April 18, 2022, <https://www.congress.gov/111/plaws/publ320/PLAW-111publ320.pdf>.
8. Be a CASA or GAL Volunteer, *National CASA/GAL Association for Children*, accessed December 5, 2022, <https://nationalcasagal.org/advocate-for-children/be-a-casa-gal-volunteer/>
9. "Custody," *Legal Information Institute*, accessed December 5, 2022, <https://www.law.cornell.edu/wex/custody#:~:text=Custody%20is%20the%20state%20of,in%20criminal%20and%20family%20law>.
10. "Custody Evaluation," *Utah State Courts*, accessed December 5, 2022, https://www.utcourts.gov/howto/family/custody_evaluation/.
11. "Ad Litem," *Dictionary.com*, accessed December 5, 2022, <https://www.dictionary.com/browse/ad-litem>.
12. "Precedent," *Dictionary.com*, accessed December 5, 2022, <https://www.dictionary.com/browse/precedent>.
13. "Jurisdiction," *Dictionary.com*, accessed December 5, 2022, <https://www.lexico.com/en/definition/jurisdiction>.
14. "Mediation," *Dictionary.com*, accessed December 5, 2022, <https://www.lexico.com/en/definition/mediation>.
15. Richard A. Gardner, *The Parental Alienation Syndrome. 2nd Edition* (Cresskill, New Jersey: Creative Therapeutics, 1998): 1–5.
16. "Chapter 13: Utah Uniform Child Custody Jurisdiction and Enforcement Act," *Utah Code*, accessed December 5, 2022, https://le.utah.gov/xcode/Title78B/Chapter13/C78B-13_1800010118000101.pdf.
17. Edward Tsui, "Divorce and Child Custody: Everything You Need to Know," *Expertise.com*, May 13, 2015, <https://www.expertise.com/divorce-attorney/divorce-and-child-custody-everything-you-need-to-know>

18. "Child Custody in Divorce: A Guide to Legal Terms & Definitions," *ARAG*, accessed December 5, 2022, <https://www.araglegal.com/member/learning-center/topics/family-and-relationships/child-custody-in-divorce>.
19. Laurel B. Watson and Julie R. Ancis, "Power and Control in the Legal System," *Violence Against Women* 19, no. 2 (2013): 166–186, <https://doi.org/10.1177/1077801213478027>.
20. "Allegation," *Dictionary.com*, accessed March 7, 2022, <https://www.dictionary.com/browse/allegation>.
21. "Abuse," *Legal Information Institute*, accessed March 7, 2022, <https://www.law.cornell.edu/wex/abuse>.
22. Bala Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?" *The Leadership Council*, September 22, 2008, <http://leadershipcouncil.org/1/med/PR3.html>.
23. Joan S. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations," *GW Law School Public Law and Legal Theory Paper* 2019-56, <https://doi.org/10.2139/ssrn.3448062>.
24. "Divorce Statistics and Facts | What Affects Divorce Rates in the US?" *Wilkinson & Finkbeiner*, accessed December 5, 2022, <https://www.wf-lawyers.com/divorce-statistics-and-facts/#:~:text=Almost%2050%20percent%20of%20all,first%20marriages%20end%20in%20divorce>.
25. *Ibid.*
26. Penelope K. Trickett, Kihyun Kim, and John Prindle, "Variations in Emotional Abuse Experiences among Multiply Maltreated Young Adolescents and Relations with Developmental Outcomes," *Child Abuse & Neglect* 35, no. 10 (October 2011) 876–886, <https://doi.org/10.1016/j.chiabu.2011.08.001>.
27. Patrick Parkinson and Judy Cashmore, "Children's and Parents' Views of Children's Participation," in *The Voice of a Child in Family Law Disputes* (Oxford Academic, December 2008), 62–90, <https://doi.org/10.1093/acprof:oso/9780199237791.003.0004>.
28. "Child Custody," *Legal Information Institute*, accessed February 28, 2022, https://www.law.cornell.edu/wex/child_custody.
29. Tiffani DiPrizito, "Play by the Rules: Why States Should Adopt Uniform Court Rules for Forensic Psychologists in Child Custody Evaluations," *Family Court Review* 54, no. 3 (2016): 512–524, <https://doi.org/10.1111/fcre.12227>.
30. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations."
31. Joyanna Silberg and Stephanie Dallam, "Abusers Gaining Custody in Family Courts: A Case Series of Over Turned Decisions," *Journal of Child Custody* 16, no. 2 (2019): 140–169, <https://doi.org/10.1080/15379418.2019.1613204>.
32. "Justice, Accountability, Integrity," *Center for Judicial Excellence*, accessed December 5, 2022, <https://centerforjudicialexcellence.org/>.
33. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
34. Erica K. Salter, "Deciding for a Child: A Comprehensive Analysis of the Best Interest Standard." *Theoretical Medicine and Bioethics* 33, no. 3 (2012): 179–198, <https://doi.org/10.1007/s11017-012-9219-z>.
35. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
36. *Ibid.*

37. "Text: H.Con.Res.72 — 115th Congress (2017-2018)," *US Senate*, September 26, 2018, <https://www.congress.gov/bill/115th-congress/house-concurrent-resolution/72/text>.
38. "US Constitution - 10th Amendment," *Constitution Annotated*, accessed December 5, 2022, <https://constitution.congress.gov/constitution/amendment-10/>.
39. Salter, "Deciding for a Child: A Comprehensive Analysis of the Best Interest Standard."
40. "United States Code," *GovInfo*, accessed September 22, 2022, <https://www.govinfo.gov/app/collection/uscode>.
41. "18 US Code § 3524 - Child Custody Arrangements," *Legal Information Institute*, accessed December 5, 2022, <https://www.law.cornell.edu/uscode/text/18/3524>.
42. Ibid.
43. Salter, "Deciding for a Child: A Comprehensive Analysis of the Best Interest Standard."
44. Andrea Charlow, "Awarding Custody: The Best Interests of the Child and Other Fictions," *Yale Law & Policy Review* 5, no. 2 (1987): 267–290, <http://www.jstor.org/stable/40239245>.
45. "Best Interest of the Child: What It Is & How to Prove It," *Custody Change*, accessed April 20, 2022, <https://www.custodyexchange.com/topics/custody/legal-concepts/best-interest-of-child.php>.
46. "Commission to Eliminate Child Abuse and Neglect Fatalities Releases Final Report—Once in a Generation Opportunity for the Administration and Congress to Act to Save Children's Lives," *Children's Advocacy Institute*, March 17, 2016, http://www.caichildlaw.org/Misc/CECANF_Press_Release.pdf.
47. "Best Interest of the Child: What It Is & How to Prove It," *Custody Change*.
48. Patricia M. Hoff, *The Uniform Child-Custody Jurisdiction and Enforcement Act* (Washington, DC: US Department of Justice, December 2001), <https://www.ojp.gov/pdffiles1/ojdp/189181.pdf>.
49. "Section 2: Jurisdiction," *The General Court of the Commonwealth of Massachusetts*, accessed December 5, 2022, <https://malegislature.gov/Laws/GeneralLaws/PartII/TitleIII/Chapter209B/Section2>.
50. "Vagueness Doctrine," *Legal Information Institute*, accessed December 5, 2022, https://www.law.cornell.edu/wex/vagueness_doctrine.
51. Salter, "Deciding for a Child: A Comprehensive Analysis of the Best Interest Standard."
52. David L. Chambers, "Rethinking the Substantive Rules for Custody Disputes in Divorce," *Michigan Law Review* 83, no. 3 (1984): 488, <https://doi.org/10.2307/1288561>.
53. Rebecca Aviel, "A New Formalism for Family Law," *William & Mary Law Review* 55, no. 6 (2014): <http://scholarship.law.wm.edu/wmlr/vol55/iss6/2>.
54. John E. B. Myers and Harry D. Krause, *Family Law in a Nutshell* (St. Paul, MN: West Academic Publishing, 2017), 95.
55. Parkinson and Cashmore, "Children's and Parents' Views of Children's Participation."
56. Myers and Krause, "Family Law in a Nutshell."
57. James N. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists," *Journal of Forensic Psychology Practice* 6, no. 2 (2006): 17–38, https://doi.org/10.1300/j158v06n02_02.
58. Parkinson and Cashmore, "Children's and Parents' Views of Children's Participation."
59. Ibid.
60. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
61. "Best Interest of the Child: What It Is & How to Prove It," *Custody Change*.
62. Marc J. Ackerman, James N. Bow, and Nicole Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going," *Professional Psychology: Research and Practice* 52, no. 4 (2021): 406–417, <https://doi.org/10.1037/pro0000380>.
63. "Neumann v. Smith," *Case Text*, January 13, 2016, <https://casetext.com/case/neumann-v-smith>.

64. Catherine Crosby-Currie, "Children's Involvement in Contested Custody Cases: Practices and Experiences of Legal and Mental Health Professionals," *Law and Human Behavior* 20, no. 3 (1996): 289–311.
65. Robert W. Hansen, "Guardians Ad Litem in Divorce and Custody Cases Protection of the Child's Interests," *The Rights of Children* (1901): 239–243.
66. Parkinson and Cashmore, "Children's and Parents' Views of Children's Participation."
67. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment," *Journal of Family Trauma, Child Custody & Child Development* 18, no. 3 (2021): 224–240, <https://doi.org/10.1080/26904586.2021.1901635>.
68. M. Brianna Pepiton et al., "Ethical Violations: What Can and Does Go Wrong in Child Custody Evaluations?" *Journal of Child Custody: Research, Issues, and Practices* 11, no. 2 (2014): 81–100, <https://doi.org/10.1080/15379418.2014.920245>.
69. Silberg and Dallam, "Abusers Gaining Custody in Family Courts: A Case Series of Over Turned Decisions."
70. Jason F. Jent et al., "Multidisciplinary Child Protection Decision Making about Physical Abuse: Determining Substantiation Thresholds and Biases," *Children and Youth Services Review* 33, no. 9 (2011): 1673–1682, <https://doi.org/10.1016/j.childyouth.2011.04.029>.
71. Jaimee L. Hartenstein, "Tender Years Doctrine," *Encyclopedia of Family Studies* (2016): 1–4, <https://doi.org/10.1002/9781119085621.wbef5449>.
72. Justin D. Levinson and Danielle Young, "Implicit Gender Bias in the Legal Profession: An Empirical Study," *Duke Journal of Gender Law & Policy* 18, no. 1 (Fall 2010): 1–44.
73. 95 Nev. 951 (1979), New York Domestic Relation Law § 240, and Utah Laws 30-3-35.2.
74. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
75. "Duff v. Kearns-Duff," *Case Text*, December 21, 2010, <https://casetext.com/case/duff-v-kearns-duff>.
76. Jent et al., "Multidisciplinary Child Protection Decision Making about Physical Abuse: Determining Substantiation Thresholds and Biases."
77. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
78. Ibid.
79. Cassandra Valerio and Connie J. Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses," *Journal of Child Custody: Research, Issues, and Practices* 14, no. 4 (2017): 260–280.
80. Ibid.
81. Marc J. Ackerman, James N. Bow, and Nicole Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going," *Professional Psychology: Research & Practice* 52, no. 4 (2021): 406–417, <https://doi.org/10.1037/pro0000380>.
82. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
83. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
84. Ibid.
85. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
86. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
87. "Daubert Standard," *Legal Information Institute*, accessed September 22, 2022, https://www.law.cornell.edu/wex/daubert_standard.

88. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
89. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
90. Martin Sellbom, "The MMPI-2-Restructured Form (MMPI-2-RF): Assessment of Personality and Psychopathology in the Twenty-First Century," *Annual Review of Clinical Psychology* 15, no. 1 (July 2019): 149–177, <https://doi.org/10.1146/annurev-clinpsy-050718-095701>.
91. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
92. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
93. Tanya Hartman-Crouch, "The Minnesota Multiphasic Personality Inventory -2 in the Context of Child Custody Litigation," *ProQuest*, 2000, <https://www.proquest.com/dissertations-theses/minnesota-multiphasic-personality-inventory-2/docview/304588796/se-2>. 2000.
94. Steven K. Erickson, Scott O. Lilienfeld, and Michael J. Vitacco, "A Critical Examination of the Suitability and Limitations of Psychological Tests in Family Court," *Family Court Review* 45, no. 2 (2007): 157–174, <https://doi.org/10.1111/j.1744-1617.2007.00136.x>.
95. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
96. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
97. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
98. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
99. Ibid.
100. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
101. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
102. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
103. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
104. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
105. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
106. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
107. Robert E. Emery, Randy K. Otto, and William T. O'Donohue, "A Critical Assessment of Child Custody Evaluations: Limited Science and a Flawed System," *Psychological Science in the Public Interest* 6, no. 1 (2005): 1–29, <https://doi.org/10.1111/j.1529-1006.2005.00020.x>.
108. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
109. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."
110. Erickson, Lilienfeld, and Vitacco, "A Critical Examination of the Suitability and Limitations of Psychological Tests in Family Court."
111. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
112. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
113. Valerio and Beck, "Testing in Child Custody Evaluations: An Overview of Issues and Uses."

114. Y. Tami Yañez, and William Fremouw, "The Application of the Daubert Standard to Parental Capacity Measures," *American Journal of Forensic Psychology* 22, no. 3 (2004), 5–28.
115. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
116. Erickson, Lilienfeld, and Vitacco, "A Critical Examination of the Suitability and Limitations of Psychological Tests in Family Court."
117. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
118. Roy Lubit, "Recognizing and Avoiding Bias to Improve Child Custody Evaluations: Convergent Data are Not Sufficient for Scientific Assessment."
119. Bow et al., "Testing in Child Custody Evaluations—Selection, Usage, and Daubert Admissibility: A Survey of Psychologists."
120. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
121. Silberg and Dallam, "Abusers Gaining Custody in Family Courts: A Case Series of Over Turned Decisions."
122. "Kortright v. Bhoorasingh 137 A.D. 3d 1037, 27 N.Y.S.3d 235 (2016)," *CaseLaw Access Project*, Harvard Law School, March 16, 2016, <https://cite.case.law/ad3d/137/1037/>.
123. Michele A. Adams, "Framing Contests in Child Custody Disputes: Parental Alienation Syndrome, Child Abuse, Gender, and Fathers' Rights," *Family Law Quarterly* 40, no. 2 (Summer 2006): 315–338, <https://search-ebscohost-com.erl.lib.byu.edu/login.aspx?direct=true&db=aph&AN=22934063&site=eehost-live&scope=site>.
124. *Child Maltreatment 2020* (US Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau, 2022), <https://www.acf.hhs.gov/sites/default/files/documents/cb/cm2020.pdf>.
125. Gabrielle Davis, "A Systematic Approach to Domestic Abuse-Informed Child Custody Decision Making in Family Law Cases," *Family Court Review* 53, no. 4 (October 2015): 565–577, <http://dx.doi.org/10.1111/fcre.12173>.
126. Gardner, "The Parental Alienation Syndrome. 2nd Edition."
127. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
128. Gardner, "The Parental Alienation Syndrome. 2nd Edition."
129. Alyssa G. Rao, "Rejecting 'Unjustified' Rejection: Why Family Courts Should Exclude Parental Alienation Experts," *Boston College Law Review* 62, no. 5 (May 2021), 1759–1796, <https://onedrive.live.com/?authkey=%21AOvuppnad8lx3l0&cid=5AEB04086749DEA9&id=5AEB04086749DEA9%211034294&parId=5AEB04086749DEA9%2121415&o=OneUp>.
130. "Robinson v. Robinson," *CaseText*, February 16, 2022, <https://casetext.com/case/robinson-v-robinson-2053>.
131. Rao, "Rejecting 'Unjustified' Rejection: Why Family Courts Should Exclude Parental Alienation Experts."
132. Joan S. Meier, "A Historical Perspective on Parental Alienation Syndrome and Parental Alienation," *Journal of Child Custody* 6, no. 3–4 (2009): 232–257, <https://doi.org/10.1080/15379410903084681>.
133. Ibid.
134. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations."

135. Jennifer J. Harman and Demosthenes Lorandos, "Allegations of Family Violence in Court: How Parental Alienation Affects Judicial Outcomes," *Psychology, Public Policy, and Law* 27, no. 2 (2021): 184–208, <https://doi.org/10.1037/law0000301>.
136. "Robinson v. Robinson," CaseText.
137. Penelope K. Trickett et al., "Emotional Abuse in a Sample of Multiply Maltreated, Urban Young Adolescents: Issues of Definition and Identification," *Child Abuse & Neglect* 33, no. 1 (2009): 27–35, <https://doi.org/10.1016/j.chiabu.2008.12.003>.
138. "Is Emotional Abuse More Harmful Than Physical Abuse?" *MHS*, May 14, 2021, <https://www.mhs-dbt.com/blog/is-emotional-abuse-more-harmful-than-physical-abuse/>.
139. Trickett et al., "Emotional Abuse in a Sample of Multiply Maltreated, Urban Young Adolescents: Issues of Definition and Identification."
140. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations."
141. *Ibid.*
142. Diane Pranzo, "Children's Rights and Children's Voices in Contested Custody and Visitation Cases in Sweden and the US," *Childhood* 20, no. 2 (2013): 283–290, <https://doi.org/10.1177/0907568212461038>.
143. Robin M. Lynch, "Unmasking the Abuse: Psychological Defenses in Child Custody Disputes," *Journal of Child Custody* 12, no. 3–4 (February 2015): 307–324, <https://doi.org/10.1080/15379418.2015.1102671>.
144. Pranzo, "Children's Rights and Children's Voices in Contested Custody and Visitation Cases in Sweden and the US."
145. "1610. Assault -- 18 USC 351(e)," *The United States Department of Justice*, accessed December 5, 2022, <https://www.justice.gov/archives/jm/criminal-resource-manual-1610-assault-18-usc-351e>.
146. Pranzo, "Children's Rights and Children's Voices in Contested Custody and Visitation Cases in Sweden and the US."
147. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
148. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations."
149. Trickett et al., "Emotional Abuse in a Sample of Multiply Maltreated, Urban Young Adolescents: Issues of Definition and Identification."
150. Silberg and Dallam, "Abusers Gaining Custody in Family Courts: A Case Series of Over Turned Decisions."
151. "Child Maltreatment 2020," US Department of Health and Human Services.
152. *Ibid.*
153. Rosana E. Norman et al., "The Long-Term Health Consequences of Child Physical Abuse, Emotional Abuse, and Neglect: A Systematic Review and Meta-Analysis," *PLoS Medicine* 9, no. 11 (2012), <https://doi.org/10.1371/journal.pmed.1001349>.
154. "Child Maltreatment 2020," US Department of Health and Human Services.
155. Joseph H. Beitchman et al., "A Review of the Long-Term Effects of Child Sexual Abuse," *Child Abuse & Neglect* 16, no. 1 (1992): 101–118.
156. Jennie G. Noll, "Sexual Abuse of Children—Unique in its Effects on Development?" *Child Abuse & Neglect* 32, no. 6 (2008): 603–605.
157. Pamela C. Alexander, "The Differential Effects of Abuse Characteristics and Attachment in the Prediction of Long-Term Effects of Sexual Abuse," *Journal of Interpersonal Violence* 8, no. 3 (1993): 346–362.
158. Roberta Hibbard et al., "Psychological Maltreatment," *Pediatrics* 130, no. 2 (2012): 372–378.

159. Trickett et al., "Emotional Abuse in a Sample of Multiply Maltreated, Urban Young Adolescents: Issues of Definition and Identification."
160. Hibbard et al., "Psychological Maltreatment."
161. Heather L. Dye, "Is Emotional Abuse as Harmful as Physical and/or Sexual Abuse?" *Journal of Child & Adolescent Trauma* 13, no. 4 (October 2019): 399–407, <https://doi.org/10.1007/s40653-019-00292-y>.
162. Clair Newton and Helen Gavin, "'My Reality Is Just Different from Yours, That Doesn't Mean I'm Crazy' Exploring the Impact of Childhood Emotional Abuse on Adult Emotional Adjustment," *Journal of Aggression, Maltreatment & Trauma* 29, no. 1 (2020): 2–21, <https://doi.org/10.1080/10926771.2018.1525461>.
163. Trickett et al., "Emotional Abuse in a Sample of Multiply Maltreated, Urban Young Adolescents: Issues of Definition and Identification."
164. Melissa M. Stiles, "Witnessing Domestic Violence: The Effect on Children," *American Family Physician*, December 1, 2002, <https://www.aafp.org/afp/2002/1201/p2052.html>.
165. Katherine M. Kitzmann et al., "Child Witnesses to Domestic Violence: A Meta-Analytic Review," *Journal of Consulting & Clinical Psychology* 71, no. 2 (2003): 339, <https://doi.org/10.1037/0022-006X.71.2.339>.
166. Ibid.
167. Howard Meltzer et al., "The Mental Health of Children Who Witness Domestic Violence," *Child & Family Social Work* 14, no. 4 (2009): 491–501, <https://doi.org/10.1111/j.1365-2206.2009.00633.x>.
168. Ibid.
169. "Convention on the Rights of the Child," *Treaty Series*, United Nations, November 1989, https://treaties.un.org/pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-11&chapter=4&clang=en.
170. Ibid.
171. *The United Nations Convention on the Rights of the Child* (Congressional Research Service, July 27, 2015), <https://crsreports.congress.gov/product/pdf/R/R40484/25>.
172. "S.Res.99 - 112th Congress (2011-2012)," *Congress.gov*, March 10, 2011, <https://www.congress.gov/bill/112th-congress/senate-resolution/99>.
173. James, Adrian L. "Children, the UNCRC, and Family Law in England and Wales." *Family Court Review* 46, no. 1 (2007): 53–64. <https://doi.org/10.1111/j.1744-1617.2007.00183.x>.
174. Kristin Skjørten, Children's Voices in Norwegian Custody Cases, *International Journal of Law, Policy and the Family*, Volume 27, Issue 3, December 2013, Pages 289–309, <https://doi.org/10.1093/lawfam/ebt011>
175. "Best Interest of the Child: What It Is & How to Prove It," Custody Change.
176. "S.Res.99 - 112th Congress (2011-2012)," *Congress.gov*.
177. Ibid.
178. Ibid.
179. Ibid.
180. Barbara Bennett Woodhouse, "Listening to Children: Participation Rights of Minors in Italy and the United States," *Journal of Social Welfare & Family Law* 36, no. 4 (December 2014): 358–369, <https://doi.org/10.1080/09649069.2014.967983>.
181. Ibid.
182. "Our Work," *DV Leap*, accessed April 20, 2022, <https://www.dvleap.org/our-work>.
183. "What does a Guardian Ad Litem do in a Family Court Case?" *Family & Safety*, August 23, 2021, <https://legalaidwv.org/legal-information/what-does-a-guardian-ad-litem-do-in-a-family-court-case/>

184. Silberg and Dallam, "Abusers Gaining Custody in Family Courts: A Case Series of Over Turned Decisions."
185. "Reasons a Judge will Change Custody or Child Support," *Custody Change*, accessed April 20, 2022, <https://www.custodyexchange.com/topics/custody/steps/reason-change-custody.php>.
186. Ackerman, Bow, and Mathy, "Child Custody Evaluation Practices: Where We Were, Where We Are, and Where We Are Going."
187. "Text: H.Con.Res.72 — 115th Congress (2017-2018)," US Senate.
188. Ibid.
189. Ibid.
190. Ibid.
191. "About Capta: A Legislative History - Child Welfare," *Children's Bureau*, accessed September 24, 2022, <https://www.childwelfare.gov/pubpdfs/about.pdf>.
192. "S.Res.99 - 112th Congress (2011-2012)," Congress.gov.
193. James L. Scherrer, "The United Nations Convention on the Rights of the Child as Policy and Strategy for Social Work Action in Child Welfare in the United States," *Social Work* 57, no. 1 (2012): 11–22, <https://doi.org/10.1093/sw/swr006>.
194. "Commission to Eliminate Child Abuse and Neglect Fatalities Releases Final Report—Once in a Generation Opportunity for the Administration and Congress to Act to Save Children's Lives," Children's Advocacy Institute.
195. Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?"
196. Bala Cynwyd, "How Many Children Are Court -Ordered Into Unsupervised Contact With an Abusive Parent After Divorce?" *The Leadership Council*, September 22, 2008, <http://leadershipcouncil.org/1/med/PR3.html>.
197. Meier et al., "Child Custody Outcomes in Cases Involving Parental Alienation and Abuse Allegations."
198. Jason F. Jent et al., "Multidisciplinary Child Protection Decision Making about Physical Abuse: Determining Substantiation Thresholds and Biases," *Children and Youth Services Review* 33, no. 9 (2011): 1673–1682, <https://doi.org/10.1016/j.childyouth.2011.04.029>.