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The "Friendly Parent" Concept—Another Gender Biased Legacy From Richard Gardner

by Joan Zorza, Esq.

Richard Gardner's First Legacy: PAS

Many people doing child custody work know that Richard Gardner created Parent Alienation Syndrome ("PAS"), a theory without any scientific basis, that has never been peer reviewed, and that is not recognized by any professional association.[1] Yet PAS has been used to deprive countless mothers of custody and force children to live with their usually abusive fathers since 1985 when Gardner created it. At least no state has codified PAS in its custody statutes, in part because it is so punitive—it calls not only for depriving custody to the parent who is deemed to be "alienating" the child from the other parent, but also for prohibiting visitation if the alienating behaviors continue. The child's continued desire to return to the "alienating parent" is seen as proof that the alienating behaviors are continuing.

But now that Gardner' image has been considerably tarnished—he brutally and repeatedly stabbed himself to death in the chest and neck,[2] advocated that pedophilia and many other paraphilias are normal and unharmful behavior,[3] published virtually all of his own books, videos and cassettes at his own press

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"How Do You Know Your Batterer Program Works?"

by Dick Bathrick, M.A., L.M.F.T.*

During trainings, when Men Stopping Violence facilitators talk about community accountability as the key to ending male violence against women and girls, participants often shift the focus to the questions, "But what do you do in your groups, and how do you know whether they're effective?"

Swift and Consistent Community Responses Reduce Recidivism

These are not bad or spurious questions because it's important to assess the efficacy of Batterers' Intervention Programs (BIPs). Ed Gondolf's comparative studies of the strengths and liabilities of batterers' programs have been extremely illuminating. Among other things, they tell us is that swift and consistent responses from the community reduce batterer recidivism. But to constantly focus on the practices and outcomes of the various BIP models may be leading us away from some more important strategies and solutions.

Community Accountability

Men Stopping Violence long ago shifted its focus to community-accountability work by integrating the concept into our intervention component, called the Men's Education Program, and by creating other initiatives that seek to engage male allies outside of the classroom. The reasons for that shift were inspired by a number of different things.

Projecting from a National Family Violence Survey and enrollment in BIPs in a major city, it's estimated that less than 2% of men who have pushed, shoved, slapped, or hit their partners — or done worse — end up in a BIP. So what are we doing with 98% of male batterers—those who don't get anywhere near a batterers' class or group? And, for those men who do attend a class for two hours a week, for 24, 36, or 52 weeks, how many of them will internalize meaningful, lasting change?

For most of their lives (including the remaining 168 hours of the week when they're not in a BIP), these men are receiving and sending powerful messages about the importance of controlling others, particularly women. In the context of a culture whose messages about domination masculinity are as endemic as the air we breathe, what does it mean to focus our solutions on BIPs? One thing it means is that we are avoiding opportunities to change the misogynist culture that produces men who batter.

In the early 1980s, some of the leading advocates in the Battered Women's Movement questioned the purpose and efficacy of BIPs. Their questions were provocative and instructive. Those advocates questioned our strategies to change men's minds and behaviors, one man or one men's group at a time, instead of focusing our efforts on the culture that shapes the attitudes and beliefs of all men, whether they're in a batterers' program or not. For instance, "when Mar-

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(Creative Therapeutics),[4] and probably misrepresented himself as a Columbia University clinical professor of child psychiatrist (based on having rented an office from the school and volunteered there)—more people are criticizing and debunking PAS. Some were deterred from doing so before his death, as Gardner was known to have threatened to sue and actually sued his critics. Even when they won, the expense, time and emotional drain was tremendous, and court-imposed gag orders on all parties prevented the winner from discussing the settlement, which kept others from learning of their win against Gardner. (Sound like the tactics of an abuser?)

Gardner claimed to have testified in 400 custody cases, seen PAS in 90% of his divorce clients, and found mothers to be the alienating parent in at least 90% of those cases allegedly involving PAS.[5] He based PAS on many false premises: that mothers often make false incest allegations in custody determinations, when in fact incest allegations are raised in only about 6% of cases and only 2-3% of that 6% are false. Incest allegations are substantiated as often during custody disputes as at other times, and men are 16 times as likely as women to make false incest allegations (21% vs. 1.3%).[6]

Richard Gardner and the "Friendly Parent" Doctrine, and Why It Resonates So Well

What has largely slipped through the cracks is the "friendly parent" concept ("FPC"), which gives preference to the parent who will better encourage a good relationship between the child and the other parent, a concept related to PAS, though sounding gentler and more child- oriented. But as we will see, it is anything but friendly. Few people know that FPC is another of Richard Gardner's creations, although he did not name it. The concept was first named in 1982 in an article on joint custody by Joanne Schulman and Valerie Pitt that criticized "friendly parent" provisions ("FPPs").[7] Until very recently the FPC received almost no attention in the custody literature,[8] but at least 32 states have enacted some type of statutory version of the FPC in their custody laws, and sadly most did so without opposition from, or even notice by, battered women's advocates or feminists.[9]

Although every state has made domestic violence ("DV") a factor that courts must consider in custody cases,[10] and at least 24 have a presumption that batterers not be given custody,[11] studies show that batterers still win custody in states with the FPC unless a statute clarifies that it does not apply when there is DV.[12] The FPC is based on many of the same myths as PAS, namely that (1) DV is rare, not that serious, often mutual, raised by mothers for tactical gain, and ends following the divorce or custody case; and (2) incest is rare and raised by mothers for tactical gain.[13]

FPC Supported by Many Mental Health Professionals. Most mental health professionals have been schooled in a family system dynamic theory that judges mothers far more harshly than fathers and perceives DV and other abuse problems as the fault of both parties, generally caused by a failure in their communication. These professionals are not trained to understand that DV, child abuse and incest are crimes, solely the fault of the perpetrator. Because these mental health providers are blind to the criminal nature of abuse and see it as a family dysfunction, both PAS and the FPC theories intuitively resonate with them.[14] Only the recent debunking of PAS[15] has made some of them abandon PAS, although most of them use the idea renamed without the "syndrome," as in, parental alienation (PA). Some have reformulated it as "estrangement," a concept that does, at least, ask if the estrangement is legitimate due to abuse. Unfortunately, many mental health providers are incompetent to perform an abuse analysis, so find the abuse not legitimate and conclude that the estrangement is caused because the mother is alienating the child from the father.

The FPC also has many of the same major problems as PAS, and these will be explored in the remainder of this article. Specifically, the FPC (1) is punitive, particularly in cases where there is DV or incest; (2) is gender biased; (3) encourages abusers to accuse their partners of unfriendly behaviors; (4) chills women from raising abuse concerns; (5) further empowers abusers; (6) allows abusers to relitigate what should be resolved issues; (7) impedes healing; (8) fails to protect women and children, or act in the best interests of the child; and (9) encourages courts and those working with them to be lazy and more gender biased.

FPC Is Punitive. The penalty for "unfriendly" behaviors (UFBs), as with alienating behaviors in PAS and PA, is loss of custody. This is particularly true, as with PAS, of any DV, child abuse, or incest allegation made against the child's father. But unlike with PAS or PA, a far larger variety of behaviors can be interpreted as "unfriendly," and it is irrelevant whether or not the child feels any hostility to the so-called "friendly" parent.

FPC Is Gender Biased. The FPC only applies to what the custodial parent does, as the sole penalty is loss of custody to the "friendly" parent. In contrast, the non-custodial father is not penalized under the concept for his UFBs. While loss of visitation by the punished custodial mother does not typically happen under the FPC, many courts further punish mothers by using PAS concepts.

Mental health providers support PAS, PA, and FPC because of their lack of real understanding or knowledge of DV, child abuse, and incest.

Furthermore, the UFBs typically done by non-custodial fathers are actually excluded from what courts consider to be UFBs. DV, child abuse, and even incest are not considered UFBs, nor is non or late payment of child support or medical insurance, even though their foreseeable consequences can include hunger, homelessness, loss of utilities, illness, adverse psychological consequences, and many other clearly unfriendly, and sometimes even life-threatening, deprivations.

Custody courts will not consider it unfriendly, even when a non-custodial father fails to visit, making it impossible for the mother to attend an important event (whether it be taking her final exams, attending a family member's wed-

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ding, or having needed surgery) or causes her extra expense (e.g., having to buy the children plane tickets at the last minute to attend a wedding, pay for babysitters, or buy extra food for the children). Likewise, the failure of a U.S. citizen or permanent resident non-custodial parent to legitimate the status of an alien spouse is not seen as unfriendly, even though it is harder to imagine anything more alienating than leaving a spouse subject to being deported at any moment and never seeing her child again. While these can be theoretically done by either parent, it is overwhelmingly men who do each of these discounted UFBs. Furthermore, that a father's UFBs adversely affect the children is also largely ignored by the courts.

In addition, courts and those acting on their behalf (e.g., custody evaluators, mediators, and GALs) typically apply FPPs in gender biased ways. They tend to believe allegations by a father, often with no supporting evidence, yet disbelieve the mother's UFB allegations or demand higher levels of proof from the mother, or even turn the mother's UFB allegations against her.[16] Courts often entertain allegations against women that they would never hold against men, e.g., a mother opposing joint custody is far more often seen as being unfriendly than a male counterpart.[17] As the gender bias studies found, courts hold women to a much higher standard, even expecting mothers to forgive men far more than they expect this of men.[18]

FPC Encourages Men to Fight and Make UFB Accusations. UFB allegations are easy for men to make, and with little risk; even if disbelieved, courts seldom make findings that a father lied or in any way punish him for false allegations. If a father succeeds in being believed, he not only deprives the mother of custody (what most abusive fathers admit they want to do, in part because they know that nothing will hurt the mother more), but he is absolved of paying child support. Furthermore, he can turn any criticism that she makes against him into an accusation that she was being unfriendly.

While the father is rewarded for his UFB accusations against the mother, the cost is enormous both emotionally and often financially on the accused custodial mother. It is almost impossible for mothers to refute UFB allegations successfully. How do you prove you didn't do something, or that the father misinterprets everything as being unfriendly? Many courts and mental health professionals refuse to admit what studies have found, namely, that most men withdraw from parenting after divorce, even when they are encouraged by their former partners to be more involved.[19] Studies also show that mothers still do two-thirds of all child care, and that even when they do not have custody, they spend more time (and more meaningful time) with their children than do fathers.[20] When visitation fails to happen, the court will likely blame the mother for the breakdown, leaving her and the child vulnerable while ignoring the father's role in the breakdown.

As a result, rather than encouraging cooperation, which is its stated goal, FPC encourages abusers to be uncooperative and unfriendly, rewarding fathers or at least not penalizing them for any UFB allegations, and blaming mothers for anything seen as going wrong.

FPC Chills Women From Raising Abuse Allegations. Faced with a system that believes the myths that abuse is rare, seldom serious, often mutual, stops after the parties divorce and is only raised by mothers for tactical gain, mothers are often chilled from raising allegations of DV, child abuse, or incest. The risk is just too great that her abuse allegations will be dismissed and turned into proof that she has acted in an unfriendly manner. Margaret Dore, quoting attorney Richard Ducote on both PAS and the FPC, notes that the greater the evidence of abuse the more fervently it is used as proof of a PAS diagnosis or UFB finding against the mother, making these concepts "the criminal defense attorney's dream."[21] (Besides testifying in many custody cases, Gardner also testified in many criminal incest and pedophilia cases on behalf of male defendants, although even he admitted that probably 95% of child sexual abuse allegations are true.[22])

FPC Empowers the Abuser. The FPC, like PAS, empowers the abuser and gives him more tools with which to harm the mother. He is far freer to escalate his abuse, using the threat of the FPC to silence her from complaining. He is more able to abuse the court process to drive her into emotional exhaustion and economic poverty. He is also likely to be able to get away with turning and using the children against her, disparaging her with others, and with many other behaviors that the FPC is meant to discourage.

In addition, by giving the father more tools to use against the mother, she is likely to become more angered, which ironically is likely to be used to further discredit her and enhance his credibility with the community and court system, including the judge, mediator, GAL, custody evaluator, police, neighbors, and even with her own family. Society judges mothers far more harshly than it does fathers, particularly for perceived failings in their role as parents.[23]

Permits Relitigation of Settled Matters. The FPC not only prevents many of the mother's legitimate complaints from being heard, but in those unusual instances when she actually gets a criminal conviction or finding of abuse against him, the FPC, like PAS, enables the father to relitigate the matter, now reframing the allegations made in the prior case as proof of her UFBs.

The mother's lawyer should always object to this tactic based on the legal principle of res judicata or issue preclusion, namely, that the issue was already judicially settled and courts may not relitigate issues involving family disputes.

Courts also fail to settle cases in many ways, e.g., they continue cases without a finding, or dismiss the charges, or dismiss the case after the abuser has completed some type of pretrial treatment or intervention program. In many jurisdictions consent agreements between the parties are not treated as res judicata, although the full faith and credit mandate of the Violence Against Women Act may preempt such treatment.[24] Attorneys representing abuse victims should object when prior findings, including those made on consent, are not treated as final judgments, and they should demand that courts make final judgments or explicit findings of abuse.

Impedes Healing. In chilling the raising of abuse allegations, and punishing those daring to raise them, the FPC impedes the healing of everyone in the family. It prevents the abuser from having to admit his abuse, the very first step needed by abusers to heal. Without naming the violence and holding the abuser accountable, particularly when it has further silenced her and empowered him, the FPC increases the victim's feelings that she is disbelieved, disempowered, and unsupported, leaving her more vulnerable to not healing. It also prevents the children from healing, instead teaching

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them that abuse by men is rewarded and that women have no power in the system to protect themselves or their children.

Ironically, the very goals that mental health providers profess for PAS, PA and the FPC (i.e., encouraging better relationships between the parents for the sake of the children) are sabotaged by these theories. Mental health providers support these theories because of their own lack of real understanding or knowledge of DV, child abuse and incest.[25]

Even worse, the same beliefs about family system dynamics that make mental health providers dismiss abuse (resulting in sending both parties to dangerous couples counseling and other mental health approaches that further impede healing), increase the power differential between the parties, and aggravate the situation.[26] Yet the more the mental health providers aggravate the situation, the more it reinforces their belief in the correctness of their initial assessment, i.e., that the couple is dysfunctional and has a communication problem that requires yet more of the same inappropriate interventions. While this may appear to be good therapy for the abuser (who often feels better the more he is vindicated and supported), even he is not helped by it, and it is a disaster for the rest of the family.

Encourages Courts to Be Lazy and Gender Biased. The FPC encourages the entire family court system to not bother to ask why a mother may be acting in an unfriendly way or examine what is in the best interest of the child, but to instead look for UFBs. Once a judge has found that a custodial mother was acting in an unfriendly way, custody is generally automatically given to the father, ignoring the child's best interests. So long as courts continue to use the FPC, PAS or PA (concepts with no scientific basis),[27] they will remain gender biased against women. The courts seldom realize that men's allegations that their partners are being unfriendly, are themselves unfriendly allegations almost always raised for tactical advantage and to hurt mothers.

Not in the Child's Best Interests. When courts and mental health professionals fail to ask why women are complaining, they fail to follow their own state's laws—every state has custody laws requiring them to take DV into account in custody decisions.[28] They also fail to protect victims of abuse as the law requires. In addition, when mothers are punished by losing custody, children are also punished by being taken away from the parent who is far more likely to nurture them and enable them to heal.[29] Rather than encouraging cooperation and good parenting (its purported goals), the FPC practically guarantees that the worse parent will get custody, which is hardly in the best interest of the child.

Several appellate courts have rejected the friendly parent concept precisely because it punishes children by removing them from the parent who might be a much better parent, even when that parent has violated a court order or made a false allegation of abuse against the other parent: **Hays v. Gama**, 67 P.3d 965 (AZ 2003); **Tekestev B.M. v. Zeineba H.**, 2007 N.Y. Slip Op. 00902 (NY A.D. 4th Dept. 2007); **Lawrence v. Lawrence**, 20 P.3d 972 (Wash. App. Ct., 2001); **Hopper v. Hopper**, __ P.3d __, 2007 WL 789419 (Idaho 2007); **John A. v. Bridget M.**, 791 N.Y.S. 2d 421 (NY A.D. 2005).

Next Steps

In any case in which custody or visitation is or could be at stake, be prepared to object if PAS, PA or the FPC is raised, particularly when it is the mother who is accused of unfriendly behaviors. Use all of the applicable arguments raised in this article, or submit this article in support of your objection. Object whether the person raising unfriendly behaviors is the non-custodial parent (arguing that such allegations are also alienating, unfriendly behaviors, probably made solely for tactical gain) or a mediator, GAL, custody evaluator, parent coordinator or judge.

Already fathers' rights activists are convincing legislatures to enact punitive and sometimes criminal provisions that punish mothers for "false" allegations of DV, child abuse, or incest, allegations that are often not investigated because most child protection agencies do not bother to investigate cases in court. These provisions must be challenged (hopefully before enactment) as blatantly gender biased. There are no similar statutes punishing fathers who lie in denying abuse, making false UFB accusations, or misstating finances. Even after enactment, these types of statutes need to be challenged based on the part of the custody laws that say the rights of the parents are equal and, when a state has one, the state's equal rights amendment.

Endnotes

[1] American Psychological Association, *Violence and the Family: Report of the American Psychological Association Presidential Task Force on violence and the family*, 40, Washington, DC: Author.

[2] The autopsy report, at http://cincinnatipas/drrichardgardnerautopsyhtml (last visited March 20, 2007), notes that he stabbed himself at least four times in the chest (one wound in the heart) and at least three times in the neck.

[3] Richard Gardner, "True and False Accusations of Child Sex Abuse, Creative Therapeutics" (1992), at pages 18-32 claimed there are evolutionary benefits of many different deviant sexual practices or paraphilias, including pedophilia, sexual sadism, necrophilia, zoophilia (sex with animals), coprophilia (sex involving defecation), klismaphilia (sex involving enemas) and urophilia (sex involving urination), and are all normal, natural forms of human sexual behavior See also Stephanie J. Dallam, "Dr. Richard Gardner: A Review of His Theories and Opinions on Atypical Sexuality, Pedophilia, and Treatment Issues," 8(1) Treating Abuse Today 15-22 (1998).

[4] Dallam, supra, note 3, at 15; wwwthelizlibrary.org/liz/gardnerresponds.htm (last visited March 20, 2007).

[5] Based on cases he appeared in, he probably inflated the number of men to appear less gender biased.

[6] Stephanie J. Dallam & Joyanna L. Silberg, "Myths that Place Children at Risk During Custody Disputes," 9(3) Sexual Assault Report 33, 33-34 (Jan./Feb. 2006).

[7] See Joanne Schulman & Valerie Pitt, "Second Thoughts on Joint Custody: Analysis of Legislation and Its Impact for Women and Children," 12 Golden Gate U Law Review 538, at 552 (1982).

[8] Your author wrote the first and second articles, both called, "'Friendly Parent' Provisions in Custody Determinations," the first published at 29 Clearinghouse Review 921-925 (December 1992) and the second published in NCADV's Child Advocacy Task Force The Bulletin, Vol VI (Fall 1992). Edward B. Borris, "Parents' Ability and Willingness to Cooperate: 'The Friendly Parent Doctrine' as a Most Important Factor in Recent Child Custody Cases," 10 Divorce Litigation 65 Part III (1998), liked the idea, and tried to rename it as a doctrine. Margaret K. Dore first called it the "friendly parent concept" in the case of Lawrence v. Lawrence, 20 P.3d 972, 974 (Wash. Ct. App. 2001), and then wrote the next major article: "The 'Friendly Parent' Concept: A Flawed Factor for Child Custody," 6 Loyola Journal of Public Interest Law 41-56 (2004).

[9] AL, AK, AZ, CA, CA, CO, DC,FL, ID, IL, IA, KS, LA, ME, MI, MN, MO, MT, NH, NV, NJ, NM, OH, OR, PA, TN, TX, UT, VT, VA, WI, and WY All but NH (which was later enacted) are mentioned in Annette M. Gonzalez & Linda M. Rio Reichmann, "Representing Children in Civil

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leadership within the law enforcement community in regard to implementing the new gun laws.

Authority to Confiscate Guns. With regard to the part of the Act allowing officers to confiscate guns used in a domestic violence incident, the law required both that officers have probable cause to believe that domestic violence had occurred and observe the firearm to be removed. The interviewees expressed uncertainty regarding police authority (e.g., what if the victim tells the officer that the batterer has a gun locked up where only he can access it?). Because of this lack of clarity, implementation was likely to vary a great deal from officer to officer and jurisdiction to jurisdiction. The researchers recommended either legislative amendment or an opinion from the state Attorney General, along with training, to clarify officers' authority to take guns, and to achieve uniform implementation of the Act.

Additionally, departments lacked secure storage facilities for confiscated firearms, which raised concerns regarding liability. Officers also expressed lack of clarity with regard to returning confiscated guns to their owners. The researchers recommended that law enforcement agencies adopt policies requiring gun owners to show proof of ownership, and then conduct background checks to make sure the owners were eligible to possess guns. Some agencies also had a policy of interviewing the suspect and others to assess the risk of future domestic violence before they would return a gun.

Clarification Needed. The authors noted that the Act was lacking in some important details, such as those noted above. The legislature needs to amend the Act to clarify how implementation will work, includiing directing law enforcement agencies to adopt written policies in this area. Frattaroli and Teret commented that the clearer the directives to law enforcement, the more likely it is that they will ensure implementation of the Act. The legislature also needs to provide funding in order to train law enforcement on implementation, and needs to monitor how implementation is going, holding leaders of law enforcement agencies accountable for any failures.

Another problem noted by the authors was that some of the implementers, including the police, did not see law enforcement's removing guns as effective in significantly reducing the risk of death between intimate partners. Since police in Maryland have a great deal of discretion in removing guns, this belief can affect the results, i.e., they may choose not to do so. The authors called on domestic violence professionals to help create an environment where the implementers feel motivated to remove guns from batterers. These professionals, working with gun control advocates, need to monitor how the Act is working, and police and judges should support funding for domestic violence specialists to work with them on implementation challenges. Finally, researchers should incorporate implementation measures into their work.

The authors conclude, "If implementation goes awry, an evaluation of the law may conclude that the law is ineffective, when the law may have been well designed but was underfunded, mismanaged, or not enforced."

Taking Guns From Batterers: Public Support and Policy Implications

by Susan B. Sorenson
30(3) Evaluation Review: A Journal of Applied Social Research 361-373 (2006)

The final piece in this special issue looked at attitudes of members of the public toward removing guns from batterers in the absence of a restraining order or a misdemeanor conviction. Professor Sorenson introduced the article by noting the interrelationship between policies and public sentiment, with each influencing the other.

In order to explore this interrelationship, she formulated a series of questions in consultation with a panel of domestic violence experts. Notably, the

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Cases Involving Domestic Violence," 39 Family Law Quarterly, 197, at 199, n. 9.

[10] But see Dore, supra, note 8.

[11] National Council of Juvenile and Family Court Judges, "Child Custody Factors," 10(1) Synergy 10 (Winter 2006.).

[12] Jannette Tucker, "Model Code Retrospective," 8(2) Synergy 6, 8 (Summer 2004); since then Connecticut was the last state to enact a statute

[13] Allison C. Morrill, Jianyu Dai, Samantha Dunn, Iyue Sung, & Kevin Smith, "Child Custody and Visitation Decisions When the Father Has Perpetrated Violence Against the Mother," 11(8) Violence Against Women 1076-1107 (2005).

[14] Dallam & Silberg, supra, note 6

[15] Marjory D. Fields, (in press) "Getting Beyond: 'What Did She Do to Provoke Him?'Comments by a Retired Judge on the Special Issue on Child Custody and Domestic Violence," Violence Against Women.

[16] See, eg., American Psychological Association, supra, note 1, at 40; and Clare Dalton, Leslie M. Drozd, Frances Q.F. Wong, *Navigating Custody & Visitation Evaluations in Cases with Domestic Violence: A Judge's Guide* 26, Reno, NV: National Council of Juvenile and Family Court Judges (2006). Available at www.ncjfcj.org/images/stories/dept/fvd/pdf/navigating_custody_12-21-06.pdf (last visited March 15, 2007).

[17] Zorza (Dec 1992), supra note 8, at 923-923.

[18] Id.

[19] Id.

[20] Frank F. Furstenberg, Jr. & Andrew J. Cherlin, *Divided Families: What Happens to Children When Parents Fail* 33-38, Cambridge, MA: Harvard University Press (1991).

[21] Daniel N. Hawkins, Paul R. Amato, & Valerie King, "Parent-Adolescent Involvement: The Relative Influence of Parent Gender and Residence," 68 Journal of Marriage and Family 125-136 (Feb. 2006).

[22] Dore, supra, note 8, at 51.

[23] Dallam & Silberg, supra note 6.

[24] Hawkins, Amato & King, supra, note 21, at 126.

[25] Codified at 18 US. C. §§ 2265 and 2266.

[26] American Psychological Association, above, note 1, at 13; Felicia Cohn, Marla E Salmon, & John D. Stobo, *Confronting Chronic Neglect: The Education and Training of Health Professionals on Family Violence*, especially page 50, Washington, DC: National Academy Press (2002).

[27] Fields, supra note 15.

[28] Dalton, Drozd, & Wong, supra, note 16, at 26.

[29] Tucker, supra, note 12, at 8, and Connecticut.

[30] American Psychological Association, supra note 1, at 53 and 124.

An earlier, shorter version of this article by Joan Zorza appeared under the title, The "Friendly Parent" Concept — Richard Gardner's Other Legacy in the National Coalition Against Domestic Violence's publication, The Voice: Journal of the Domestic Violence Movement, 12-18 (Fall, 2006). ■