

THE PARENTAL ALIENATION CONTROVERSY

Two Opposing Views

By Judge Stephanie Domitrovich, PhD

Controversy surrounds the admissibility of evidence of parental alienation in both civil and criminal court cases. The two articles that follow—“Parental Alienation Syndrome: 30 Years On and Still Junk Science” and “Parental Alienation: Misinformation versus Facts”—present diametrically opposed positions.

Federal and state courts’ approaches to parental alienation evidence have varied within civil and criminal areas of the law. Trial judges, as gatekeepers under Federal Rule of Evidence 702 and similar state rules, must ensure scientific expert testimony is derived from valid “scientific knowledge” before it is admitted for the jury’s consideration, and judges are expected to examine each expert’s methodology for reliability and relevance. Under the *Frye* standard, parental alienation may or may not be generally accepted as a concept within the relevant scientific community of experts, such as psychiatrists and psychologists. Under the *Daubert* standard, in addition to general acceptability, trial judges consider other flexible factors on the validity of the scientific methodology or technique, such as empirical testing and whether hypotheses are falsifiable or refutable, known or potential error rates, existence and maintenance of scientific standards and controls, and whether scientific methodology has been subjected to peer review and publication.

Authors critical of parental alienation emphasize the lack of empirical research. They argue that parental alienation is not included in the renowned authority for mental disorders, the *Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition* (“DSM-5”). Other authors argue that, although the words “parental

alienation” do not appear in the *DSM-5*, an expert can diagnose a child affected by parental alienation within the “spirit of parental alienation” when using recognized disorders cited in the *DSM-5*, such as Parent-Child Relational Problems, Child Affected by Parental Relationship Distress, Child Psychological Abuse, Delusional Symptoms in Partner if Individual with Delusional Disorder, and Factitious Disorder Imposed on Another. The Pennsylvania Superior Court recently recognized parental alienation as a factor for trial judges to consider in awarding custody in high-conflict family court cases. In *W.C.F. v. M.G.*,¹ it reversed a trial judge for not considering the importance of parental alienation evidence when evaluating and weighing statutory best interest factors for determining child custody. The intermediate appellate court panel of Judges Lazarus and Wecht discussed the importance of considering parental alienation:

The [trial] court noted that Father was more likely to promote Child’s relationship with Mother than Mother would with Father, in fact stating, “Mother is not likely to encourage or permit frequent and continuing contact between Father and Child.” . . . Not only was parental alienation an issue, but the repeated attempts of Mother to allege abuse that were found not credible by the [trial] court, the influence of maternal grandmother, the refusal of Mother to cooperate with Father, all would outweigh retaining primary custody with Mother absent a compelling rationale evidenced by the trial court. While prudence dictates that this

Court exercise its authority sparingly in a child custody case, we are not powerless to rectify a manifestly unreasonable custody order.²

The Editorial Board of *The Judges’ Journal* has decided to present you with both views on parental alienation evidence. On the following pages, we offer you the works of reputable authorities to help you evaluate arguments for both positions.

Trial judges must make these admissibility determinations in civil family court cases where custody must be decided based on the best interest of children and in criminal cases where child sexual abuse charges are alleged and must be proven beyond a reasonable doubt. Defendants’ “loss of liberty” may be at stake on the basis of this evidence. In criminal jury trials, state courts have ruled parental alienation evidence is not beyond the “ken” or common experience of the jury and, therefore, is not admissible. U.S. federal courts ruling under the Hague Convention on civil international child abduction cases have admitted evidence on parental alienation, as have other countries’ courts, such as the Brazilian federal court.

Provocative admissibility issues surround parental alienation, whether as a concept or as a “syndrome” in both civil and criminal cases. After reading these articles, you will be able to make more well-informed decisions regarding parental alienation and its admissibility in federal and state courts. And the controversy continues . . . ■

Endnotes

1. 2015 PA Super 102, 2015 Pa. Super. LEXIS 231 (2015).
2. *Id.*, 2015 Pa. Super. LEXIS 231, at *20–21.

PARENTAL ALIENATION SYNDROME

30 Years On and Still Junk Science

By Rebecca M. Thomas and James T. Richardson

Editor's Note: A version of this article that includes endnotes is available from the authors, who can be reached at rebeccat@unr.edu and jtr@unr.edu.

Despite having been introduced 30 years ago, there remains no credible scientific evidence supporting parental alienation syndrome (PAS, also called parental alienation (PA) and parental alienation disorder (PAD)). The concept has not gained general acceptance in the scientific field, and there remains no test, no data, or any experiment to support claims made concerning PAS. Because of this lack of scientific credibility, many organizations—scientific, medical, and legal—continue to reject its use and acceptance.

The Presidential Task Force of the American Psychological Association on Violence in the Family has stated that

“there are no data to support the phenomenon called parental alienation syndrome, in which mothers are blamed for interfering with their children’s attachment to their fathers. . . .” The National Council of Juvenile and Family Court Judges (NCJFCJ) likewise finds PAS lacking in scientific merit, advising judges that based on evidentiary standards, “the court should not accept testimony regarding parental alienation syndrome, or ‘PAS.’ The theory positing the existence of PAS had been discredited by the scientific community”; and “the discredited ‘diagnosis’ of ‘PAS’ (or allegation of ‘parental alienation’), quite apart from its scientific invalidity, inappropriately asks the court to assume that the children’s behaviors and attitudes toward the parent who claims to be ‘alienated’ have no grounding in reality.” The American Prosecutors’ Research Institute and the National District Attorney’s Association, legal organizations concerned with the prosecution of child abuse and domestic violence, have also dismissed PAS.

Attempts have been made to legitimize PAS by having it included in the *Diagnostic and Statistical Manual of Mental Disorders (DSM)*, used by mental health professionals to substantiate diagnoses. In rejecting PAS for inclusion in the most recent edition, Dr. Darrel Regier, vice chair of the task force drafting the manual, stated, “It’s a relationship problem—parent-child or parent-parent. Relationship problems per se are not mental disorders.” The Board of Trustees would not even consider putting it in section 3, disorders needing further research. The American Professional Society on the Abuse of Children (APSAC) objected to its inclusion because “the empirical data supporting a disorder are quite weak” and the proposed diagnostic criteria “assume[] omniscience of the
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PARENTAL ALIENATION

Misinformation versus Facts

By William Bernet

Editor's Note: A version of this article that includes endnotes is available from the author, who can be reached at william.bernet@vanderbilt.edu.

Several of the most intense controversies involving law and medicine have pertained to child psychology and psychiatry. Arguments have addressed whether practitioners of satanic rituals abuse and murder children, whether recovered memories of adults reliably describe past maltreatment during childhood, whether facilitated communication helps autistic children disclose sexual abuse, and whether children always tell the truth when reporting sexual abuse. One of the most active controversies involving children in a legal context has pertained to parental alienation (PA), which some critics have said does not exist but was invented as a mechanism for abusive fathers to gain control of their children from protective mothers. The author of this essay believes that PA exists and damages thousands of children and families in the United States every year. However, attorneys and judges are exposed to much misinformation regarding PA.

Parental Alienation and Courts

PA is a mental condition in which a child—usually one whose parents are engaged in a high-conflict separation or divorce—allies himself strongly with one parent (the preferred parent or alienating parent) and rejects a relationship with the other parent (the target parent) without legitimate justification. The child's rejection of the target parent must be without justification for the child to be considered alienated; if a parent has been abusive or severely neglectful, the child's rejection of that parent is understandable and does not constitute PA. Most contemporary writers use *parental estrangement* to describe a

child's rejection of a parent for a good reason, such as a history of abuse or neglect; they use *parental alienation* to describe a child's rejection of a parent without a good reason. With that distinction in mind, estrangement is typically caused by the rejected parent's own behavior; alienation is usually caused by the preferred parent's indoctrination or brainwashing of the child to fear or dislike the rejected parent.

PA comes to the attention of lawyers and judges in several ways, the most common being child custody or parenting time determinations. When judges make decisions on contested custody and visitation schedules, they take a number of factors into account, including the child's attachment with his parents. When a child refuses to have contact with one parent, the court must sort out whether the child's refusal is justified (estrangement) or not justified (alienation). PA issues also arise in cases involving child maltreatment, especially sexual abuse. That is, children experiencing a moderate or severe level of PA occasionally make up allegations that the rejected parent has abused them to justify their refusal to have visitation with that parent.

PA has been described in the legal literature since the early nineteenth century,
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professional and rel[y] on the professional's subjective interpretation of the child's behaviors and statements. Moreover, the terms used to describe the child's behaviors are not defined. . . . It is surprising that in the intervening 20 years [since diagnostic criteria were first suggested] no better definitions and no research have attempted to measure these characteristics in any systematic way." Finally, and most interestingly, a foremost PAS proponent and

drafter of the proposed diagnostic criteria, Dr. William Bernet, stated in an interview after PAS was rejected, "We need to have consistent definitions of PA, which have proven validity and reliability, in order for research personnel to study the causes, manifestations, and treatment for PA."

Despite this broad range of experts finding the concept untenable, with even proponents admitting there is no agreed-upon definition with which to begin research, a minority, mostly made up of mental health professionals and expert witnesses who earn a living in the divorce field, continue to insist on claiming that there is enough science to support the use of PAS in the legal arena. Most of the "evidence" offered to establish PAS as a credible "diagnosis" is based on clinical observation. Clinical observation has some uses: it can allow for description of a phenomenon. What it cannot do, however, is provide evidence of the cause of the observed phenomenon. It does not provide an opportunity for replication, one of the tenets of the scientific method. Observation is best used to set forth the variables to be tested during experimental research. So while researchers have published articles describing PAS, none have produced experimental evidence that can be replicated to establish PAS exists as either a discreet phenomenon or a causal effect.

Even when clinical observers claim to be able to distinguish an alienated child from an otherwise disturbed child, there is no objective way to verify their conclusion. In addition, no studies identify a supposedly alienated child absent the accusation by a parent. Most information a therapist uses to make a "diagnosis" typically comes from the accusing parent. Empirical research shows that when children reject a parent, there are multiple reasons, including possible negative behaviors by the rejected parent, child abuse or neglect, or the child's developmental difficulties or personality.

Some mental health practitioners, despite the tenuous scientific status of many mental health theories and practices, have asked the courts to accept them as expert witnesses able to present scientific evidence

supporting PAS. Such claims mean that courts should hold them to the same standards as other professionals. The Supreme Court has ruled that all proffered scientific evidence—even that based in the clinical "soft sciences"—must meet the standard set in *Daubert*. *Daubert* established criteria for admissibility of scientific evidence, including peer review, publication, testability, error rate, and general acceptance within the scientific community. PAS does not meet these standards. Any expert testimony regarding PAS could not be allowed under current established criteria.

Plainly, any mental health diagnosis requiring family court involvement as both a feature of the "illness" and the "cure" is dubious at best. The "cure" suggested is removal of the child from the custody of the "offending" parent and, in some cases, a cut-off of all contact between that parent and child. In addition, the "cure" for the child is "deprogramming" the "brainwashing." Given that family courts are intended to be therapeutic, it is difficult to understand a court participating in psychological "diagnosis" that requires trauma to the family as the "cure." If we are to accept PAS as a real problem, the solution currently in use is completely antithetical to the mission of family courts. When accusations of PAS arise, other, multiple reasons for a child's behavior are likely to exist. Ethical practice requires these other possible reasons be considered, not ignored.

Given the lack of empirical evidence and the *general nonacceptance* by scientific, medical, and legal authoritative bodies, we are left to scratch our heads and wonder why articles such as this one are needed. Perhaps family courts need to look inward and ask what it is about the evidentiary standards and processes of family courts that keep this discredited syndrome alive. While the mission of family courts is to address legal issues in a therapeutic manner, they are nonetheless courts and charged to enforce law and establish justice. Evidentiary admissibility may have a lesser standard in civil court, but not so loose that it allows for the admission of wishful thinking dressed in scientific clothing. ■

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although it was typically called “alienation of affection” or some similar term. PA has been described in the mental health literature since the 1940s and the related term, “parental alienation syndrome” (PAS), was introduced by Richard Gardner in 1985. Gardner used the word “syndrome” to join together the following eight behaviors that frequently co-occur in children who experience PAS:

- campaign of denigration against the target parent;
- frivolous rationalizations for the child’s criticism of the target parent;
- lack of ambivalence;
- independent-thinker phenomenon;
- reflexive support of the alienating parent against the target parent;
- absence of guilt over exploitation and mistreatment of the target parent;
- borrowed scenarios; and
- spread of the child’s animosity toward the target parent’s extended family.

A comprehensive book, *Parental Alienation: The Handbook for Mental Health and Legal Professionals*, includes summaries of 500 U.S. and Canadian legal cases in which PA was a consideration. PA is an international phenomenon: the bibliography of the *Parental Alienation* handbook includes citations from 35 countries. The legislatures of Brazil and several states in Mexico have recognized that causing PA in a child is a form of psychological abuse. In 2013, the French Court of Cassation (Supreme Court) recognized PA as “un élément nouveau” (a change in circumstances) and, as such, officially recognized the reality of PA. Also, PA has been an important factor in several decisions of the European Court of Human Rights.

Despite the importance of PA for both mental health and legal professionals and despite the acceptance of PA by hundreds of courts in many countries, there has been vigorous criticism of this concept. Typically, advocates who support victims of domestic violence and child abuse are

concerned that perpetrators of child maltreatment may use PA as a way to avoid responsibility for their behavior. The debate—between advocates concerned about PA and those concerned about domestic violence—has generated both facts and misinformation. This article addresses several examples of misinformation regarding PA and PAS, which I will briefly address and refute. PA/PAS misinformation has also been discussed by other authors. (In this article, “PA” and “PAS” are almost synonymous.)

Misinformation: “Parental Alienation Does Not Exist.”

Critics frequently allege that Gardner and his followers simply concocted PA and PAS, which do not exist in real life. For example, a book intended for legal professionals referred to “the PAS fabrication of Richard Gardner and the ‘fathers’ rights’ (FRs) movement, which was never proven by research or peer-reviewed studies and has been thoroughly debunked.” Experienced mental health professionals have also expressed that opinion. For instance, psychologist Peter Jaffe and his colleagues said, “Many professionals in the field maintain that [parental alienation syndrome] does not exist. . . . It is still troubling that the court admitted the PAS testimony at all, given the serious issues as to whether PAS even exists.”

However, that piece of misinformation was disproven by Jaffe himself, who was one of the authors of a short article that established just the opposite: that the vast majority of experienced mental health and legal professionals agree with the basic proposition of PA. At the 2010 annual meeting of the Association of Family and Conciliation Courts, about 300 attendees completed a brief survey regarding PA. Jaffe and his colleagues reported: “Nearly all of the respondents to the survey (98 percent) endorsed the question, ‘Do you think that some children are manipulated by one parent to irrationally and unjustifiably reject the other parent?’ . . . The survey results were overwhelming in support of the basic tenet of parental alienation.” Also, the phenomenon of PA has been described by mental health and

legal professionals from every continent on earth. The bibliography of the *Parental Alienation* handbook contains hundreds of references related to PA and PAS, which constitute enormous support for the reality of this mental condition.

Misinformation: “Parental Alienation Has Not Been Recognized by Professional Associations.”

This is a common allegation by critics of PA and PAS. For example, Jaffe et al. said, “Although Parental Alienation Syndrome (PAS) has not been recognized by any major mental health or legal association, it has infiltrated the family justice system.” Sociologists Sharon Araji and Rebecca Bosek wrote, “PAS is not recognized in the most current version of the *Diagnostic and Statistical Manual of Mental Disorders (DSM-IV-TR)* as a legitimate syndrome.”

While it is true that the actual words “parental alienation” are not in the *Diagnostic and Statistical Manual of Mental Disorders*, now in its fifth edition (*DSM-5*), the concept is clearly expressed in that book. Children who experience PA can be identified by *DSM-5* terms such as “child affected by parental relationship distress,” “parent-child relational problem,” and “child psychological abuse.”

Leading mental health and legal organizations have acknowledged the reality of PA through their publications, national and international meetings, and educational programs for their members. For example:

- The ABA published a book by Stanley S. Clawar and Brynne V. Rivlin, *Children Held Hostage: Identifying Brainwashed Children, Presenting a Case, and Crafting Solutions* (1st ed. 1991; 2d ed. 2013), an exhaustive study of 1,000 families in which the children were brainwashed to dislike and reject one of their parents.
- The American Psychological Association published Elizabeth M. Ellis’s *Divorce Wars: Interventions with Families in Conflict* (2000), which discusses in detail assessment and treatment of children affected by PA.
- The American Academy of Child and

Adolescent Psychiatry (AACAP) published *Practice Parameters for Child Custody Evaluations* (1997), which was considered an “AACAP Official Action.” That document refers explicitly to “parental alienation” and explains this phenomenon.

- PA papers and symposia have been presented at many conferences for mental health and legal professional organizations such as the American Academy of Forensic Sciences (2010, 2012), Association of Family and Conciliation Courts (2010), American Academy of Psychiatry and the Law (2010, 2014), American Academy of Child and Adolescent Psychiatry (2010, 2012), American Psychological Association (2011), VI Congreso Nacional de Psicología Jurídica y Forense (Spain, 2011), American Psychiatric Association (2011, 2013), American College of Forensic Psychology (2013), International Congress on Law and Mental Health (The Netherlands, 2013), International Society for Interpersonal Acceptance and Rejection (India, 2013), and World Congress of Psychiatry (Spain, 2014).

Misinformation: “PAS Is Junk Science.”

The meme that “PAS is junk science” has taken on a life of its own. An influential psychiatrist, Paul J. Fink, stated in 2003 that PAS constitutes “junk science.” Fink repeated that opinion many times, and he has been quoted by other critics of PA and PAS. For example, in 2010 he reiterated—in his column in *Clinical Psychiatry News*—that PAS was “junk science invented by a psychiatrist.” At the same time, Fink added the claim that “‘father’s rights’ groups who don’t like to be interfered with when they are sexually abusing their children . . . [have] petitioned the DSM task force to include PAS in the publication.” After receiving letters objecting to Fink’s statements, the management of *Clinical Psychiatry News* arranged for him to issue an apology and a clarification. Fink then said, “I do not deny that parental alienation occurs and that a lot of people are hurt when there is an alienator.”

Another example of the meme that PAS

is junk science was a legal journal article by Andrea C. Farney and Roberta L. Valente, in which they referred to “the scientifically defunct and legally unjustifiable theory of parental alienation syndrome (PAS) in custody cases.” The idea that PAS constitutes “bad science” or “junk science” is usually based on the premise that Richard Gardner “had no empirical data to support this theory [of PAS], and in fact, self-published his ideas.” For example, Joan S. Meier wrote, “There is actually no empirical research validating the existence of PAS.” Persistent critics Stephanie J. Dallam and Joyanna L. Silberg said, “Gardner has never submitted his theory to scientific testing and it has never been shown to be a valid syndrome.” The idea made its way to Spain, where a book intended for both legal and mental health personnel referred to PAS as “an unfounded syndrome, lacking any scientific basis, discarded in the U.S. today.”

Regarding the allegation of “no empirical data,” Gardner was a clinician who made observations of the individuals he evaluated, much as Leo Kanner did when he described childhood autism and Gilles de la Tourette did when he identified Tourette’s syndrome. Regarding self-publishing, Gardner did self-publish some of his books, but he also published many scientific papers on PAS in peer-reviewed journals. Regarding the allegation of “junk science,” since Gardner introduced the term “parental alienation syndrome” in 1985, PA and PAS have been described in hundreds of professional articles, chapters, and books by mental health and legal professionals in at least 35 countries on six continents. Although it is true that most of that research is descriptive and qualitative, there has also been quantitative research regarding PA by Amy J. L. Baker and her colleagues, Janet Johnston and her colleagues, and other individuals and groups.

Misinformation: “Advocates for Parental Alienation Say That Abuse Allegations Are Always False.”

When critics of PA and PAS publish papers, they frequently misrepresent this mental condition in order to have an easy straw man to refute. For example, law professor Carol S. Bruch said that in custody disputes, PAS advocates say the custodial

parent is “presumed to be lying and poisoning the child.” Likewise, Jennifer Hoult published a law review article in which she referred to “PAS’s presumption that abuse allegations are always false.” Years later, Joan S. Meier repeated that sentiment, saying, “Gardner’s PAS theory presumes that a child’s hostility to a father is pathological. . . .”

It is flatly incorrect to allege that PAS advocates say that custodial parents and children are always lying when they make allegations of abuse. Of course, authors who are knowledgeable about this topic are concerned that false allegations of child abuse *sometimes* occur in high-conflict divorce in the context of PA. However, they would never claim that abuse allegations in the context of PA are *always* false. PA scholars have written extensively about the importance of telling the difference between alienation (when the child’s rejection of a parent is driven by the false belief that the parent is evil or dangerous) and estrangement (when the child’s rejection of a parent is driven by a history of actual abuse or neglect). Ruling out actual abuse or neglect is an essential step in making a determination of PA.

Misinformation: “Richard Gardner and His Followers Advocated for Pedophilia.”

Perhaps the most outrageous allegation made by PA critics has been that Gardner and endorsers of his teachings advocate pedophilia. These false allegations are usually created by taking Gardner’s writings out of context. He wrote about pedophilia and incest and said that those behaviors have historically been widespread, but he stated that as a historical fact. His writings certainly did not indicate that he approved the practice. In fact, Gardner strongly disapproved of pedophilia and stated that pedophiles should be in prison.

Propagators of False Information

Several organizations actively oppose the introduction of PA, PAS, and similar concepts in legal proceedings. The organizations are not secret; they openly

announce their opposition. For example, the Leadership Council on Child Abuse and Interpersonal Violence discusses PAS extensively on its website. It refers to “simplistic ‘junk science’ theories to explain the child’s behavior,” noting that “Parental Alienation Syndrome (PAS) is one such theory. The unsophisticated, pseudoscientific theory explains a child’s estrangement from one parent or allegations of abuse at the hands of one parent by blaming the other.” The former president of the Leadership Council was Paul J. Fink—discussed earlier in this article—who said many times that PAS is junk science. Also, Jennifer Hoult’s work, discussed above, was partly supported by the Leadership Foundation. I commend the Leadership Council for educating mental health and legal professionals and the general public regarding child maltreatment and domestic violence. However, I disagree with their pattern of denying PA’s reality and importance.

The Domestic Violence Legal

Empowerment and Appeals Project (DV LEAP) is another organization that actively opposes PA. The founder and legal director of DV LEAP, attorney Joan S. Meier, regularly criticizes the concept of PA. The website of the organization (<https://www.dvleap.org>) includes news articles in which Meier was interviewed regarding PA and PAS. In a media interview, for example, Meier said, “Many experts argue that when alienation surfaces in the legal system, it is used to punish well-intentioned mothers who raise allegations of abuse.” There have been cases in which a court relied on testimony regarding PA that were subsequently reversed by a higher court. However, let’s not throw out the baby with the bath water and exclude all arguments regarding PA.

Conclusions

Friction and mistrust occur between advocates concerned about domestic violence and child abuse and advocates concerned

about PA. At the risk of oversimplification, I say: Domestic violence is a serious problem in many families, but sometimes there are false allegations of domestic violence; and PA is a serious problem in many families, but sometimes there are false allegations of PA. It is incorrect to minimize either issue or to dismiss the topic in a peremptory manner by calling it junk science or lacking in empirical evidence. Although I have zero experience as a judge, I suggest that allegations of domestic violence as well as allegations of PA be taken seriously and considered in enough detail to sort out the truth, the half-truths, and the non-truths. Given the complexity of family life, there are no quick or easy answers. ■

The author appreciates the suggestions of Amy J. L. Baker, PhD; Demosthenes Lorandos, PhD, JD; and S. Richard Sauber, PhD.

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