



The Nelson A. Rockefeller Center at Dartmouth College

The Center for Public Policy and the Social Sciences

The Class of 1964 Policy Research Shop

PARENTAL ALIENATION IN NEW HAMPSHIRE

Understanding, Identifying, and Combating Parental Alienation

Presented to the Children and Family Law Committee

PRS Policy Brief 1819-07

May 21, 2019

Prepared By:

Alexandra Norris '19

Wyatt Williams '19

With Contributions From:

Zoë Chandra '21

Stevie Karol '21

Alana Tucker '18

Anna Wilinsky '21

This report was written by undergraduate students at Dartmouth College under the direction of professors in the Rockefeller Center. Policy Research Shop (PRS) students produce non-partisan policy analyses and present their findings in a non-advocacy manner. The PRS is fully endowed by the Dartmouth Class of 1964 through a class gift in celebration of its 50th Anniversary given to the Center. This endowment ensures that the Policy Research Shop will continue to produce high-quality, non-partisan policy research for policymakers in New Hampshire and Vermont. The PRS was previously funded by major grants from the U.S. Department of Education, Fund for the Improvement of Post-Secondary Education (FIPSE) and from the Ford Foundation and by initial seed grants from the Surdna Foundation, the Lintilhac Foundation, and the Ford Motor Company Fund. Since its inception in 2005, PRS students have invested more than 65,000 hours to produce more than 190 policy briefs for policymakers in New Hampshire and Vermont.



Contact:

Nelson A. Rockefeller Center, 6082 Rockefeller Hall, Dartmouth College, Hanover, NH 03755

<http://rockefeller.dartmouth.edu/shop/> • Email: Ronald.G.Shaiko@Dartmouth.edu



TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1. INTRODUCTION	1
2. PURPOSE STATEMENT	1
3. DEFINING AND CHARACTERIZING PARENTAL ALIENATION	2
3.1 DEFINING PARENTAL ALIENATION	2
3.2 EFFECTS OF PARENTAL ALIENATION ON CHILDREN	3
3.3 CONSIDERATIONS REGARDING THE LEGISLATION OF PARENTAL ALIENATION	4
4. EXISTING PATHWAYS FOR PREVENTION	5
4.1 CHILD IMPACT SEMINAR	5
4.2 FACTORS IN DETERMINING PARENTAL RIGHTS AND RESPONSIBILITIES	5
4.3 GUARDIANS AD LITEM	6
4.4. MODIFYING PARENTAL RIGHTS AFTER ALIENATION OCCURS	7
5. POTENTIAL PATHWAYS FOR PREVENTION	8
5.1 LEGAL EDUCATION INITIATIVES	8
5.2 PUBLIC AWARENESS	9
5.3 AMENDING RSA 461-A	9
6. CONCLUSION	10
REFERENCES	111



EXECUTIVE SUMMARY

Parental alienation is a set of behaviors, sometimes exhibited during divorce proceedings, in which one parent attempts to undermine the relationship between the other parent and their child. This report identifies that such behaviors exist on a continuum with varying levels of psychological impacts for the victims, and can often be difficult to define or recognize. There are several pre-existing pathways in New Hampshire for the prevention of alienation, as well as options for mitigating the effects of alienation if it arises. These opportunities include a mandatory child impact seminar for all divorce cases involving minor children, the guidelines enumerated in RSA 461-A:6 which inform the determination of parental rights and responsibilities, and the opportunities for modification of parental rights and responsibilities. Some tools, such as the utilization of existing statutes, are not explicitly labeled for the prevention of parental alienation, but could nonetheless be applied to those situations. If the legislature decides that further action is warranted and not harmful, this paper also explores a few potential options for the creating more preventive measures, including cooperation with the judiciary branch on legal education, and raising public awareness.

1. INTRODUCTION

Parental alienation occurs when a parent shows apathy towards or seeks to destroy the child's relationship with the other parent, and typically arises in relation to divorce proceedings. Children who are alienated from a parent may face severe psychological consequences throughout their lives. Children may be unaware of the fact that they have been alienated. Legal professionals, judges, and lawmakers may identify behaviors associated with parental alienation in order to find appropriate methods of legislating, ruling on cases, and treating those involved.

2. PURPOSE STATEMENT

In 2018, the New Hampshire State Senate passed Senate Bill 489 establishing a committee to study parental alienation in New Hampshire. The research resulting from this committee's report aims to address several key goals, as enumerated by the bill:

- Defining parental alienation and its characteristics
- Examining the causes, costs, and effects of parental alienation
- Examining the role of the courts in cases involving parental alienation
- Examining the relationship between parental alienation and domestic abuse, violent crime, substance abuse, and mental illness
- Studying the treatment of parental alienation, both for the perpetrators and the victims
- Examining what, if any, preventive measures should be implemented



In order to address parental alienation, it is essential to understand its causes, effects, and correlates. This report defines parental alienation along a continuum of behaviors, both of parents and of children. Identifying these behaviors may help develop legal intervention programs. If judges, family law attorneys, and guardians ad litem properly identify instances of parental alienation, proper action may then be taken. Understanding how issues such as domestic abuse or drug use may be interrelated can aid in the proper identification of parental alienation; however, it can be difficult to distinguish false accusations from legitimate ones; we will discuss this further in Section 3.3.

Understanding New Hampshire custody laws and precedents is also crucial to understanding parental alienation, prevention, and treatment in context. In Section 4.4, we will review court cases from other states that have set precedents on how their legal systems approach parental alienation. We will then explore the relevant provisions in New Hampshire law, specifically Best Interest of the Child (BIC) statutes, and discuss how existing legal framework such as the establishment of a Guardian ad Litem (GAL) or declaring a child to have diminished capacity can assist in preventing or dealing with cases of parental alienation.

Section 5 explores new approaches to preventing parental alienation. This includes incorporating parental alienation into continuing legal education programs through the New Hampshire Bar as well as in GAL trainings. The legislature may amend RSA 461-A to specify how judges should better handle cases involving parental alienation. The legislature may also take steps to increase public awareness.

3. DEFINING AND CHARACTERIZING PARENTAL ALIENATION

3.1 Defining Parental Alienation

The American Psychological Association does not recognize Parental Alienation Syndrome, but does acknowledge that “the more generalized concept of parental alienation often is viewed as a legitimate dynamic in many family situations, describing the harm done to a child’s security with one caregiver as a result of exposure to another caregiver’s unfavorable actions toward or criticism of that person.”¹

Parental alienation occurs when a parent (the alienating parent) vilifies the other parent (the target parent) in order to destroy the target parent’s relationship with their child. According to Dr. Peggie Ward and J. Campbell Harvey, Esq. in the New Hampshire Bar Journal, parental alienation may be described as a continuum of alienating behaviors ranging from mild to severe alienation.

- **Mild:** Mild alienating behaviors can cause children to feel uncomfortable during times of transition when their parents divorce or separate and is characterized by the apparent indifference of the alienating parent. The alienating parent might



exhibit little regard for the importance of contact or visitation with the target parent, claiming that the decision to contact or spend time with the other parent is up to the child. The alienating parent usually does not encourage their child to maintain a relationship with the target parent and may be intolerant of the presence of the other parent by, for example, refusing to attend any events where the target parent will be present.

- **Moderate:** Moderate alienating behaviors can include refusal to speak to, be physically near, or hear anything about the target parent. Subtle accusations about the target parent, negative comments, and destruction of memorabilia related to the target parent also qualify as moderate alienating behaviors.
- **Overt:** Overt alienating behaviors present as the alienating parent's concrete belief that the target parent presents a danger to the child or children. These behaviors can include false or delusional statements about the target parent, framing the child as a victim, outright criticizing the target parent, asking the child to keep secrets, or threatening to withdraw love for the child. Conscious motivation is always present at this stage.
- **Severe:** Severe alienating behaviors can include extreme measures such as explicitly preventing a child from seeing or contacting the target parent altogether. At this stage, the child may take on the alienating parent's desires and beliefs.²

3.2 Effects of Parental Alienation on Children

Children subject to parental alienation may display eight hallmark behaviors:³

1. A "campaign of denigration," in which a child's love for the target parent is stifled and sometimes replaced with hatred. Children sometimes deny having any positive memories of the target parent.
2. Weak or ridiculous rationalization for the "campaign of denigration," in which the child fails to fully understand and explain why they have such negative feelings towards the target parent.
3. Lack of ambivalence, in which the child eventually perceives the alienating parent to be all good, while the target parent is seen to be entirely bad.
4. The "independent thinker" phenomenon, which refers to the child adopting the flawed rationale of the alienating parent while believing that their behavior is uninfluenced.
5. Reflexive support for the alienating parent—the child automatically favors one parent and will always choose their side.
6. Mimicking the behavior of the alienating parent.
7. Spreading animosity to their friends or extended family, which can cause more family members to turn against the target parent.
8. Lack of guilt for treating the target parent with cruelty or exploiting the target parent. Many children who have been alienated from a parent are actually eager to attack or exploit the target parent.



There may also be long term psychological effects associated with parental alienation. Children who are alienated from a parent can display symptoms characteristic of dissociation or panic disorder. Furthermore, children and the target parent may never fully repair their relationship, the effects of which can continue well into adulthood.

A 2005 study was conducted that surveyed 38 adults who had been alienated from their parents as children. The survey suggested that child victims of parental alienation had disproportionately low rates of self-esteem and higher rates of self-hatred, depressive episodes during their adult lives, and problems with drug or alcohol abuse. Participants also reported difficulty in building trusting relationships after being alienated from a parent during childhood. Other studies have also suggested that parent-loyalty conflicts can affect children into adulthood.⁴ Much of the psychological literature indicates that unhealthy parent-child relationships or parental absence can seriously harm children, and parental alienation is sometimes defined as a form of emotional abuse.⁵

Despite consensus on the importance of parent-child relationships, there is significant disagreement among scholars as to what the exact psychological consequences of parental alienation are, since parental alienation itself is often hard to pinpoint.

3.3 Considerations Regarding the Legislation of Parental Alienation

Understanding correlations between parental alienation and issues such as drug abuse, mental health issues, and domestic violence could be crucial to identifying parental alienation cases. One study on the prevention of parent-child alienation found that “alienation rarely happens as a discrete problem and is usually part of other difficulties related to family conflicts, mental health issues, domestic violence allegations, and unresolved feelings about the separation.”⁶

In addition, parental alienation allegations are sometimes used by violent or otherwise abusive parents to distract from their own problematic behaviors. Perpetrators of abuse can fight allegations against themselves by accusing a target parent of alienation in court.⁷ Although false allegations of domestic abuse are rare, courts often view them as attempts to further custody claims and are quick to question the legitimacy of a woman’s claim of abuse.⁸ As a result, perpetrators of abuse can use false parental alienation allegations to defend themselves in court.

In this context, it may be worth considering the potential impacts of raising public awareness of parental alienation. It is a difficult and sensitive issue to suggest that any allegation of a parent engaging in harmful behaviors with their child is false. However, making the issue more publicly salient could lead to a rise in behaviors that the legislature seeks to prevent, whether allegations are true or false. This must be weighed carefully against other potential outcomes.



4. EXISTING PATHWAYS FOR PREVENTION

In New Hampshire, the infrastructure surrounding divorce proceedings currently provides opportunities for the prevention, identification, and mitigation of parental alienation. While some of these pathways are connected to action that the legislature has taken in the past, the majority are related to the authority of the courts. It is important to note that the programs or instances of the law mentioned here do not always specifically state that they aim to protect target parents and children from parental alienation, but that their practical applications could still be useful in alienating situations.

4.1 Child Impact Seminar

New Hampshire has made efforts to make parents aware of the toll that divorce, especially acrimonious divorce, can take on children. In 1993, the state passed a law requiring “married or unmarried parents of minor children who are involved in allocating parental rights and responsibilities and other issues” to attend a mandatory training session where they are taught how to minimize the adverse impact of the litigation process and familial separation on children.⁹ This seminar may be the first opportunity parents have to learn about alienating behaviors. The session is typically conducted by certified family therapists and covers several topics including, but not limited to:

- Understanding the process of divorce or separation: interaction between parent and child, areas of adjustment, and areas of concern.
- Understanding how children react to the divorce or separation, how to spot problems, what to tell them about divorce or separation, how to keep communication open, and answering questions and concerns they may have about the process.
- How parents can help their children during the divorce or separation, including specific strategies, ideas, tools, and resources for assistance.
- How parents can help children after the divorce or separation, including new family structures, and how to deal with different sets of rules.
- Making clear that the general goal of cooperation between parents may sometimes be inappropriate, particularly in cases of domestic violence.¹⁰

4.2 Factors in Determining Parental Rights and Responsibilities

New Hampshire RSA 461-A¹¹ is the guiding set of statutes by which courts consider parental rights and responsibilities. RSA 461-A:6 specifically requires that the best interests of the child (BIC) be taken into account when determining parental rights and responsibilities, though other subsections provide additional considerations. The following factors enumerated there are of particular interest:



- The ability and disposition of each parent to foster a positive relationship involving frequent and continuing physical, written, and telephonic contact with the other parent, including whether contact is likely to result in harm to the child or to a parent.
- The support of each parent for the child's contact with the other parent as shown by allowing and promoting such contact.
- The support of each parent for the child's relationship with the other parent.
- The ability of the parents to communicate, cooperate with each other, and make joint decisions concerning the children.

In 2016, researchers conducted a study surveying all fifty states' BIC statutes in cases where custody or parental rights are disputed. They aimed to identify if these statutes could be relevant in cases of parental alienation. Thirty-nine states (78 percent) have provisions that take into account the wishes of the child when considering parental rights, but none includes guidance or further rules for approaching a situation where a child might be subject to undue influence--such as psychological harm from parental alienation.¹² RSA 461-A:6 mentions undue influence, but does not identify potential sources or guidance for determining at what point the child's opinion is compromised. Courts can act citing this statute when making decisions regarding parental rights in cases of alienation. The legislature could consider amending this statute to explicitly name parental alienation or add additional considerations.

4.3 Guardians ad Litem

In cases where parents cannot agree on a parenting plan for their children, a guardian *ad litem* (GAL) is appointed to investigate specific issues that are in dispute. The investigation can include interviews with the parents, children, and other persons who may have pertinent information. In most cases, the GAL prepares a written report which includes custody and visitation recommendations that, in the GAL's estimation, are in the best interest of the children.¹³ This report may differ from what a child would consider to be their own preference or best interest, especially in cases of alienation, where the wishes of a child may have been influenced without their knowledge.

GALs have a unique relationship to the children in divorce proceedings, and therefore may be able to get a different view of the situation than the judge presiding over the case, who must be impartial. New Hampshire currently maintains a certification and training process for GALs, where GALs could potentially be more extensively informed about the symptoms and impacts of parental alienation. GALs would then be equipped to identify alienating behaviors and their potential impacts on the child in an individual case.



4.4. Modifying Parental Rights after Alienation Occurs

If parental alienation occurs after divorce proceedings and the determination of custody of children have concluded, there are still opportunities to address the behavior. In cases where “repeated, intentional, and unwarranted interference by a parent with the residential responsibilities of the other parent” occurs, “the court may order a change in the parental rights and responsibilities without the necessity of showing harm to the child, if the court determines that such change would be in accordance with the best interests of the child.”¹⁴

The court can also look to existing precedents in determining how to proceed. In the case of *Miller v. Todd*, the New Hampshire Supreme Court vacated a parental rights and responsibilities decision after finding that Todd alienated her children from their father. The Court reasoned “it was because of the unfounded allegations of sexual abuse that Miller was denied any contact with his children for over two years and had little opportunity to establish a home life with them between 2004 and 2009.”¹⁵ Further, the Supreme Courts of other states have heard cases that dealt with parental alienation:

- **Vermont:** *Begins v. Begins*. In a decision to reverse custody due to evidence of parental alienation, the court wrote, “In light of the court's express findings that mother had been the primary caretaker before the separation, that father had been the principal cause of the boys' estrangement from mother, and that every other consideration rendered mother the more suitable custodian, we conclude that the court's decision to award parental rights and responsibilities to father was untenable.”¹⁶
- **New York:** *Lauren R. v. Ted R.* In a decision to hold the mother in contempt the New York Supreme Court determined that “[t]he extensive record is replete with instances of attempts to undermine the relationship between the children and their father and replace him with her new husband, manipulation of defendant's parenting access, utter and unfettered vilification of the defendant to the children, false reporting of sexual misconduct without any semblance of ‘good faith,’ and her imposition upon the children to fear her tirades and punishment if they embrace the relationship they want to have with their father.”¹⁷
- **Florida:** *Wade v. Hirschman*. The Court found “competent, substantial evidence...of parental alienation of the Father by the Mother” which resulted in the reopening of custody hearings and eventually led to a reversal of custody.¹⁸



5. POTENTIAL PATHWAYS FOR PREVENTION

If the legislature determines that further action is warranted and not harmful, there are options for creating additional preventive measures, including cooperation with the judiciary branch on legal education and raising public awareness.

5.1 Legal Education Initiatives

One way to mitigate the effects of parental alienation is through education programs for professionals who might deal with parental alienation, namely: judges, family law attorneys, and GALs. Parental alienation curricula could be implemented into existing education programs. For example, New Hampshire legislation requires that all judges attend continuing judicial training and education programs once a year.¹⁹

Additionally, the state may cooperate with the New Hampshire Bar Association to incorporate Parental Alienation into their continuing legal education (CLE) requirements.²⁰ The module used for continuing judicial training could be adapted for CLE programs for New Hampshire attorneys. Other states have taken similar measures:

- **Washington:** The Washington State Bar Association accepts CLE credits for a course entitled ‘Parental Alienation Syndrome (PAS): Science, Evidentiary Admissibility, Policy & Effects on Children’s Constitutional and Human Rights.’²¹

Further, New Hampshire has mandatory GAL training to obtain and maintain certification that includes modules on addiction, recovery, and domestic violence.²² Adding a module on parental alienation could educate GALs and prepare them to identify situations where alienation may be taking place. Other states have taken similar measures:

- **South Carolina:** An hour-long seminar on parental alienation was included in a South Carolina Bar Association 2018 GAL program. The seminar explored visitation refusal and helped to identify when visitation refusal could indicate unwarranted parental alienation.²³ This was also a paid program, which would require coordination with the SCBA to learn the details of what was shared.
- **Michigan:** In the August/September 2018 issue of the *Family Law Journal* published by the State Bar of Michigan includes a substantial section covering parental alienation. The article covers the roles of GALs in parental alienation cases.²⁴

Cooperation with the New Hampshire Bar Association and encouragement for them to implement these educational initiatives or accept these credits may better assist practitioners involved in parental alienation cases. The existing curricula would need to be funded, but should New Hampshire wish to implement a similar program, the American Bar Association could be contacted regarding sharing resources.



5.2 Public Awareness

There are many groups, both globally and domestically, that seek to create greater public awareness of parental alienation. According to one such organization, the National Parents Organization, sixteen US states now recognize Parental Alienation Awareness Day on April 25 each year.²⁵ While recognizing this day will not fall to the legislature alone, similar public statements or proclamations could be made. However, this option should be considered in relation to the points made in Section 3.3, namely the potentially harmful side effects that could arise with an increased public awareness of parental alienation, such as a rise in false allegations used as a tool in court by abusers.

5.3 Amending RSA 461-A

If the legislature finds that the pre-existing pathways to prevention are insufficient, they may take legislative action by amending RSA 461-A:6, covering Best Interest in Determination of Parental Rights and Responsibilities.

Currently, Section I, outlining the factors the court is to consider in determining the Best Interest of the Child, includes, “the support of each parent for the child’s contact with the other parent as shown by allowing and promoting such contact, including whether contact is likely to result in harm to the child or to a parent,” as well as the, “support of each parent for the child’s relationship with the other parent, including whether contact is likely to result in harm to the child or to a parent.” This language might be amended to explicitly reference parental alienation as a factor of consideration.

Additionally, defining parental alienation through a list of specific behaviors may guide courts in these cases. A study surveying state laws addressing this issue found existing state statutes taking this approach. These statutes explicitly consider: the parent’s ability to support the other parent’s relationship with the child (35 states), whether one parent intentionally files false allegations against the other (8 states), and whether a parent had involved the child in inter-parent disputes (3 states).²⁶

An amendment could be made to Section II, which advises the court to give “substantial weight to the preference of the mature minor child,” when they find “that a minor child is of sufficient maturity to make a sound judgment.”²⁷ However, the court is told to “give due consideration to other factors which may have affected the minor child’s preference, including whether the minor child’s preference was based on undesirable or improper influences.”²⁸ An amendment may be made to explicitly mention parental alienation as an “undesirable or improper influence,” in which case the court may find in opposition to the child’s preference.



6. CONCLUSION

In conclusion, while parental alienation has real impacts on children and target parents, it is sometimes difficult to identify, and it is up to the legislature to decide whether New Hampshire would benefit from additional actions to prevent or mitigate it. Existing pathways include child impact seminars, the legislated set of guidelines used by courts to determine parental rights during divorce proceedings, and the presence of a Guardian ad Litem to advocate for the child's best interests. If parental alienation occurs after divorce proceedings have been finalized, provisions in the law and precedents set by courts show that there is still the opportunity to take action to mitigate the effects of the alienation. Existing pathways are not always explicitly labeled for the prevention or mitigation of parental alienation, but may still be useful in this regard.

The legislature may also wish to consider the value of promoting existing programs or taking new actions to combat parental alienation. Alienation never occurs in a vacuum; it may be used as a tool through which the alienating parent may create false allegations against a target parent. The prevalence of this type of behavior is unknown, but raising awareness of alienation could simultaneously increase claims of such behavior (true or false) in court. The impact of these allegations on the life of a parent and on the relationship with his or her child can and will be serious.

If the legislature decides that further action is warranted and not potentially harmful, there are additional pathways available. The legislature may encourage incorporation of parental alienation education in the New Hampshire Bar Association's continuing legal education program or in the training of GALs. They may amend RSA 461-A to tailor the considerations of Best Interest of the Child to better handle instances of parental alienation. The legislature may also seek to promote public awareness of the issue through cooperation with groups or designating an awareness day.



REFERENCES

1. “APA Dictionary of Psychology.” N.d. Accessed October 30, 2018. <<https://dictionary.apa.org/parental-alienation-syndrome>>
2. Ward, Peggie, and J. Campbell Harvey. "Family Wars: The Alienation of Children." *New Hampshire Bar Journal* vol. 34 no. 1. March 1993. <<https://www.fact.on.ca/Info/pas/ward02.htm>>
3. Gardner, Richard. “Parental Alienation Syndrome vs.” *Cresskill, NJ: Creative Therapeutics*, 1999, p. 1.
4. “The Long-Term Effects of Parental Alienation on Adult Children: A Qualitative Research Study.” N.d. Accessed October 30, 2018. https://www.researchgate.net/publication/228362179_The_Long-Term_Effects_of_Parental_Alienation_on_Adult_Children_A_Qualitative_Research_Study, pg 293. ; Verrocchio, Maria Christina, Amy J. L. Baker, and Daniela Marchetti. “Adult Report of Childhood Exposure to Parental Alienation at Different Developmental Time Periods: Exposure to Parental Alienation.” *Journal of Family Therapy* 40 (4): 602–18. 2018. <https://doi.org/10.1111/1467-6427.12192>.
5. Gardner, Richard. “Parental Alienation Syndrome vs.” *Cresskill, NJ: Creative Therapeutics*, 1999.
6. Jaffe, Peter G., et al. “Early Identification and Prevention of Parent-Child Alienation: A Framework for Balancing Risks and Benefits of Intervention.” *Family Court Review*, Wiley/Blackwell (10.1111), 15 Jan. 2010, onlinelibrary.wiley.com/doi/full/10.1111/j.1744-1617.2009.01294.x#b17.
7. Bancroft, Lundy, et al. “The Batterer as Parent.” *Google Books*, books.google.com/books?hl=en&lr=&id=GcEgAQAQAQBAJ&oi=fnd&pg=PP1&dq=parental%2Balienation%2Band%2Bdomestic%2Bviolence&ots=Rx9v4RSH1j&sig=LU2RCpzm9aSSz8AS07qit1i-pPQ#v=onepage&q=parental%20alienation%20&f=false.
8. Lapierre, Simon & Côté, Isabelle. “Abused women and the threat of parental alienation: Shelter workers' perspectives.” *Children and Youth Services Review*. 65, 10.1016. 22 March 2016.
9. N.H. RSA 458-D:1
10. Ibid.
11. <http://www.gencourt.state.nh.us/rsa/html/xliiii/461-a/461-a-mrg.htm>
12. Baker, Amy, Mariann Asayan, and Alianna Lacheen-Baker. “Best Interest of the Child and Parental Alienation: A Survey of State Statutes.” *Journal of Forensic Sciences*, vol. 61, no. 4. July 2016.
13. New Hampshire Judicial Branch. “Circuit Court Family Division - Guardians ad Litem.” N.d. Accessed October 2018. <<https://www.courts.state.nh.us/fdpp/gal.htm>>
14. NH RSA 461-A:11



15. Miller v. Todd, No. 2009-806 (NH 2011).
16. Begins v. Begins, No. 97-334 (VT 1998).
17. Lauren R. v. Ted R, No. 203699-02 (NY 2010).
18. Wade v. Hirschman, No. SC04-1012 (FL 2005).
19. "Rules of The Supreme Court of The State of New Hampshire, Rule 45: Continuing Judicial Education." Accessed October 2018.
<https://www.courts.state.nh.us/rules/scr/scr-45.htm>.
20. "Continuing Legal Education." New Hampshire Bar Association. N.d. Accessed October 2018. <<https://www.nhbar.org/nhbacle/>>
21. "Judicial Education Programs - Judicial Administration State Links." National Center for State Courts. 26 June 2018. <<https://www.ncsc.org/topics/judicial-officers/judicial-administration/state-links.aspx?cat=Judicial Education Programs>>
22. "Guardian Ad Litem Training." New Hampshire Office of Professional Licensure and Certification. N.d. Accessed October 2018.
<<https://www.oplc.nh.gov/guardian-ad-litem/training.htm>>
23. "In the Best Interests of the Child: 2018 Annual Guardian Ad Litem Training and Update." South Carolina Bar. Accessed October 30, 2018.
24. Ibid.
25. "6 More States Declare April 25th 'Parental Alienation Awareness Day.'" *National Parents Organization*, n.d. Accessed February 2019.
<<https://www.nationalparentsorganization.org/blog/581-6-more-states-declar>>
26. Baker, Amy, Mariann Asayan, and Alianna Lacheen-Baker. "Best Interest of the Child and Parental Alienation: A Survey of State Statutes." *Journal of Forensic Sciences*, vol. 61, no. 4. July 2016.
27. <http://www.gencourt.state.nh.us/rsa/html/xliiii/461-a/461-a-mrg.htm>
28. Ibid.