CASES WITH "ISSUES"



FAMILY LAW LITIGATION INVOLVING SUBSTANCE ABUSE AND MENTAL ILLNESS

Presented by:
Kelly L. Burris
Partner
Cordell & Cordell

U.S. Drug Use Stats



-U.S. has 6% of world Population

-Consumes 50% of world's cocaine

-60% of all Drugs Worldwide

-9.4% of all adults age 12+ are illicit drug users

-Increases to 22.6% for 18 to 20 year olds

-7.9% for 50 to 64 year olds

-Over 55% of Adults Aged 18 to 60 drink alcohol at least once per month

-Over 6% are Heavy Drinkers

(5+ drinks per day on 5+ days a week)

Identifying Drug Problems

- **Alcoholism**
  - **How many times per week**
  - **How much?**
  - **Arrested, pulled over?**
  - **Family expressed concern?**
- **Illegal Drugs**
  - **Any use is bad use**
  - **Used knowing would be in court soon?**
  - **Drug Test First!!**
- **Prescription Drug Abuse**
  - **Harder to Identify**
  - **How often renew prescription?**
  - **Take medication for more than one ailment in last year?**
  - **Getting prescriptions from more than one doctor?**

Substance Abuse Screening

- Substance Abuse Subtle Screening Inventory (SASSI)
  - Used primarily for alcohol abuse screening
- National Institute on Drug Abuse
  - Provides helpful information on various screening methods.
  - https://www.drugabuse.gov/nidamed-medical-health-professionals/tool-resources-your-practice/additional-screening-resources

Alcohol Screening

- ETOH (Ethyl) Alcohol Testing - 8 to 12 hrs.
- EtG (Ethyl Glucuronide)- up to 80 hours
- Alcohol Swab- - 8 to 12 hrs
- PEth (blood spot testing)- up to 28 days but only for heavy or abusive drinking
- Soberlink and other BAC Tests- 8 to 12 hrs
  - www.soberlink.com
  - Sends report through app on phone

Testing and Counseling



- Drug test your client before the court does
  - Work product privilege
- Take all prescriptions to testing facility.
- If one parent uses, they likely both use
- Have the kids been exposed?
- What counseling has been done and what needs to be done?
  - Get em' into rehab/AA
- Best strategy is to always take responsibility

Understanding Drug Tests

- Urine or Hair Testing?
  - Get Both- Some drugs will show positive on one and not the other depending on when use occurred
  - Creatinine levels- Normal =150 to 200 ; Diluted = 20 or less
- Hair and Nail Testing- Many Criminal Courts Don't Use
  - Follicle v. Hair- Reliable?
  - Higher levels in body hair than from scalp.
- Panels- 5, 7, 10, 12 or 17 panel
  (can ask for even more drugs)
- Cutoff levels- Eliminates second hand usage
- Metabolization-
  - Methamphetamine to amphetamine
  - Heroin to Morphine (Opiates)
  - Cocaine to Benzoylecgonine, Norcocaine, Cocaethylene



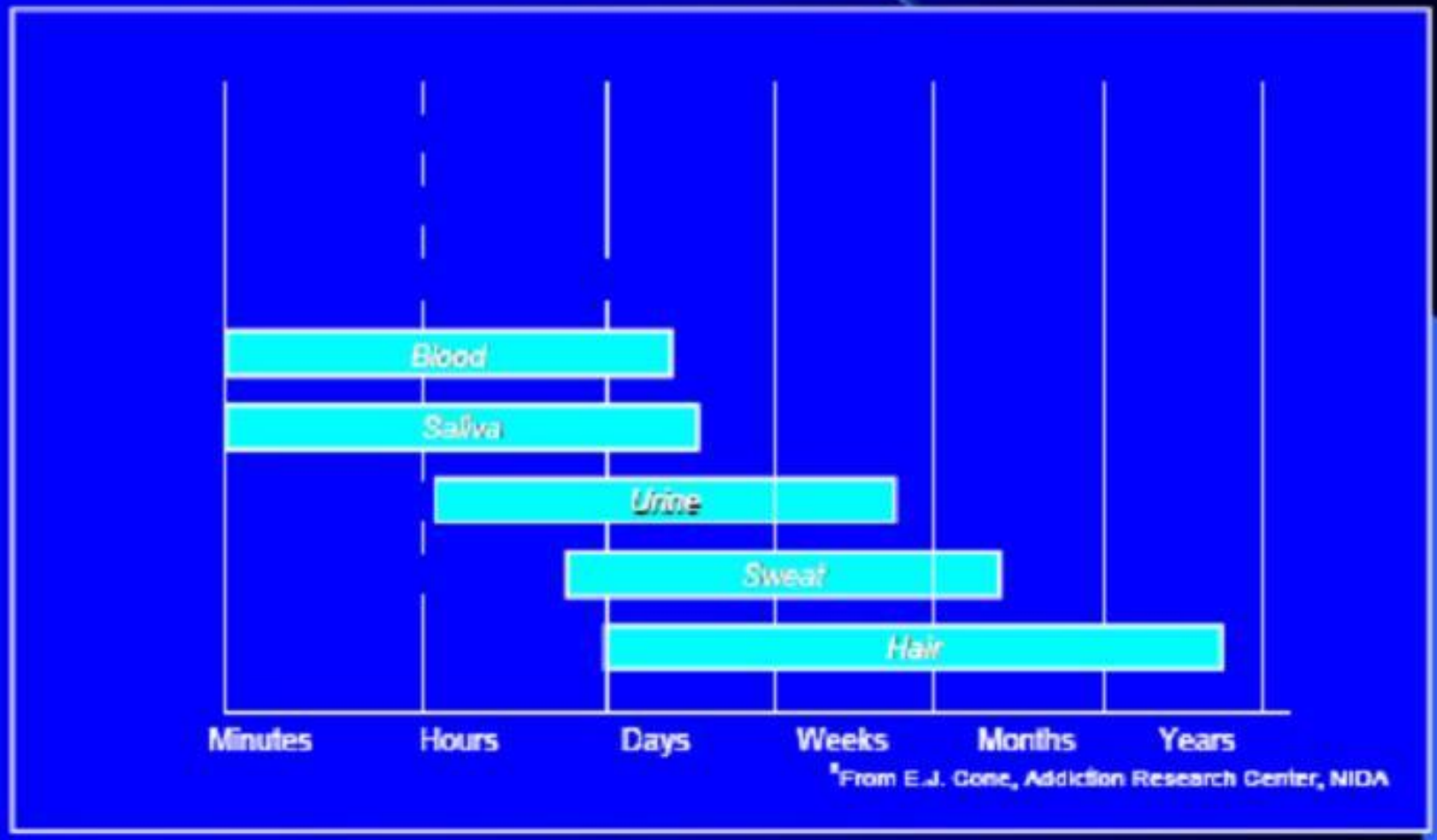
Levels of Usage in Hair

HAIR 5-PANEL	LOW USE (RECREATIONAL)	MEDIUM USE (RECREATIONAL)	HIGH USE (RECREATIONAL)
Amphetamines	500-2500pg	2500-7500pg	7500+pg
Cocaine	500-2000pg	2000-10,000pg	10,000+pg
Opiates	500-1000pg	2000-8000pg	9,000+pg
Phencyclidine	300-500pg	500-1000pg	2000+pg
Marijuana	Qualitative- amount does not correlate to usage		

Detection Time After Use in Urine

- Cocaine Metabolites — 2 to 5 days
- THC Metabolites — 1 to 40 days
- Propoxyphene — 6 hrs to 10 days
- Phencyclidine (PCP) — 2 to 10 days
- Methadone — 1 to 3 days
- Opiates — 2 to 4 days
  - Heroin — 8 hours
- Amphetamines — 3 to 5 days
- LSD — few hours

Drug Detection Periods*



*From E.J. Cone, Addiction Research Center, NIDA

ealth Technologies
1501
, TX 76201

[redacted] ealth Technologies Inc

Client Test Results

Specimen Outcome: Negative

Client Name:
Client ID:
Specimen: [illegible]
Reference:
Requested By:
Agency: Walk-in

Collected: 08/31/09 09:45AM
Collected By:
Tested: 08/31/09 09:48AM
Test Reason: PERSONAL
Approved: 08/31/09 09:48AM
Approved By:

	Result		Cutoff
AMPH	0 ng/mL	NEGATIVE	1000 ng/mL
COCAINE	0 ng/mL	NEGATIVE	300 ng/mL
OPIATE	0 ng/mL	NEGATIVE	2000 ng/mL
PCP	0.0 ng/mL	NEGATIVE	25 ng/mL
THC	0 ng/mL	NEGATIVE	50 ng/mL
CREATININE	113.0 mg/dL	NORMAL	< 20 abnormal
OXIDANT	0 ng/mL	NEGATIVE	200 ng/mL

Comments:

GC/MS CONFIRMATION OF A POSITIVE URINE SCREEN TEST IS STRONGLY RECOMMENDED IF LEGAL ACTION IS ANTICIPATED

Created on: Aug 31, 2009 9:48 AM

OMEGA

Requesting Agency:
Health Technologies,
1601
, TX, 76201
Telephone: (

LAN#: 1
Specimen ID: 47
Reason For Test: Other
Date Collected: 6/30/2009
Date Received: 7/2/2009
Date Reported: 7/7/2009

Donor ID: _____ SSN: _____

Test(s) Requested: **Hair 5 Drug Panel**

The standard Hair 5 Drug Panel Test includes the testing of the 5 major drug classes.
These include:
Amphetamines - Amphetamine, Methamphetamine and Ecstasy (MDMA)
Cocaine - Cocaine/Cocaine Metabolites
Opiates - Codeine, Morphine, Heroin Metabolite
Phencyclidine(PCP)
THC Metabolite(Marijuana)

Drugs Tested For	Result	Screening Cut Off *picograms per milligram*	Confirmation Cut off *picograms per milligram*
Amphetamines	Negative	500 pg/mg	500 pg/mg
Cocaine/Metabolites	**Positive**	500 pg/mg	500 pg/mg
Cocaine	**Positive**		500 pg/mg
Benzoylecgonine	**Positive**		50 pg/mg
Norcocaine	**Positive**		50 pg/mg
Cocaethylene	**Positive**		50 pg/mg
Opiates	Negative	300 pg/mg	300 pg/mg
Phencyclidine	Negative	300 pg/mg	300 pg/mg
THC Metabolite	Negative	1.00 pg/mg	0.30 pg/mg

Hair 5 Drug Panel Test Result(s)

Cocaine - Positive	**101574 pg/mg**
Benzoylecgonine - Positive	**15085 pg/mg**
Norcocaine - Positive	**1199 pg/mg**
Cocaethylene - Positive	**186 pg/mg**

A positive result indicates that the drug was identified at a level greater than its above listed cutoff and was confirmed by GC/MS

Report Notations

Body hair (approximately 12 month time frame)

Certified By: Patrick

Ph.D
Laboratory Director

OMEGA

Requesting Agency:
I : Health \
1501 I
, TX, 76201
Telephone: !

LAN#: 1
Specimen ID: (
Reason For Test: Personal
Date Collected: 8/31/2009
Date Received: 9/1/2009
Date Reported: 9/3/2009

Donor ID: _____ SSN: _____

Test(s) Requested: **Hair 5 Drug Panel**

The standard Hair 5 Drug Panel Test includes the testing of the 5 major drug classes.
These include:
Amphetamines - Amphetamine, Methamphetamine and Ecstasy (MDMA)
Cocaine - Cocaine/Cocaine Metabolites
Opiates - Codeine, Morphine, Heroin Metabolite
Phencyclidine(PCP)
THC Metabolite(Marijuana)

Drugs Tested For	Result	Screening Cut Off *picograms per milligram*	Confirmation Cut off *picograms per milligram*
Amphetamines	Negative	500 pg/mg	500 pg/mg
Cocaine/Metabolites	**Positive**	500 pg/mg	500 pg/mg
Cocaine	**Positive**		500 pg/mg
Benzoylecgonine	**Positive**		50 pg/mg
Norcocaine	**Positive**		50 pg/mg
Cocaethylene	**Positive**		50 pg/mg
Opiates	Negative	300 pg/mg	300 pg/mg
Phencyclidine	Negative	300 pg/mg	300 pg/mg
THC Metabolite	Negative	1.00 pg/mg	0.30 pg/mg

Hair 5 Drug Panel Test Result(s)	
Cocaine - Positive	**23528 pg/mg**
Benzoylecgonine - Positive	**2774 pg/mg**
Norcocaine - Positive	**312 pg/mg**
Cocaethylene - Positive	**383 pg/mg**

A positive result indicates that the drug was identified at a level greater than its above listed cutoff and was confirmed by GC/MS

Report Notations

0.25 - 0.75 inches in length (approximately 0-15,45 day time frame)

Certified By: Laboratory Director

Omega Laboratories, Inc. - 400 N. Cleveland Ave. - Mogadore, OH 44260

OMEGA

Requesting Agency:
Health Technologies,
1501
TX, 76201
Telephone:

LAN#:
Specimen ID:
Reason For Test: Personal
Date Collected: 10/29/2009
Date Received: 10/30/2009
Date Reported: 11/3/2009

Donor ID: _____ SSN: _____

Test(s) Requested: **Hair 5 Drug Panel**

The standard Hair 5 Drug Panel Test includes the testing of the 5 major drug classes.
These include:
Amphetamines - Amphetamine, Methamphetamine and Ecstasy (MDMA)
Cocaine - Cocaine/Cocaine Metabolites
Opiates - Codeine, Morphine, Heroin Metabolite
Phencyclidine(PCP)
THC Metabolite(Marijuana)

Drugs Tested For	Result	Screening ELISA Cut Off *picograms per milligram*	Confirmation Cut off *picograms per milligram*
Amphetamines	Negative	500 pg/mg	500 pg/mg
Cocaine/Metabolites	**Positive**	500 pg/mg	500 pg/mg
Cocaine	**Positive**		500 pg/mg
Benzoylecgonine	**Positive**		50 pg/mg
Norcocaine	**Positive**		50 pg/mg
Cocaethylene	**Positive**		50 pg/mg
Opiates	Negative	300 pg/mg	300 pg/mg
Phencyclidine	Negative	300 pg/mg	300 pg/mg
THC Metabolite	Negative	1.00 pg/mg	0.30 pg/mg

Hair 5 Drug Panel Test Result(s)

Cocaine - Positive	**15646 pg/mg**
Benzoylecgonine - Positive	**2276 pg/mg**
Norcocaine - Positive	**251 pg/mg**
Cocaethylene - Positive	**214 pg/mg**

A positive result indicates that the drug was identified at a level greater than its above listed cutoff and was confirmed by GC/MS

REPORT NOTATIONS

less than 0.25 - 0.75 inches in length (approximately 0-15,45 day time frame)

OMEGA

Requesting Agency:
Health Technologies,
1501
TX, 76201
Telephone:

LAN#:
Specimen ID:
Reason For Test: Personal
Date Collected: 11/30/2009
Date Received: 12/1/2009
Date Reported: 12/3/2009

Donor ID: SSN:

Test(s) Requested: **Hair 5 Drug Panel**

The standard Hair 5 Drug Panel Test includes the testing of the 5 major drug classes.
These include:
Amphetamines - Amphetamine, Methamphetamine and Ecstasy (MDMA)
Cocaine - Cocaine/Cocaine Metabolites
Opiates - Codeine, Morphine, Heroin Metabolite
Phencyclidine(PCP)
THC Metabolite(Marijuana)

Drugs Tested For	Result	Screening ELISA Cut Off *picograms per milligram*	Confirmation Cut off *picograms per milligram*
Amphetamines	Negative	500 pg/mg	500 pg/mg
Cocaine/Metabolites	**Positive**	500 pg/mg	500 pg/mg
Cocaine	**Positive**		500 pg/mg
Benzoylecgonine	**Positive**		50 pg/mg
Norcocaine	**Positive**		50 pg/mg
Cocaethylene	**Positive**		50 pg/mg
Opiates	Negative	300 pg/mg	300 pg/mg
Phencyclidine	Negative	300 pg/mg	300 pg/mg
THC Metabolite	Negative	1.00 pg/mg	0.30 pg/mg

Hair 5 Drug Panel Test Result(s)

Cocaine - Positive	**5539 pg/mg**
Benzoylecgonine - Positive	**1361 pg/mg**
Norcocaine - Positive	**76 pg/mg**
Cocaethylene - Positive	**60 pg/mg**

A positive result indicates that the drug was identified at a level greater than its above listed cutoff and was confirmed by GC/MS

REPORT NOTATIONS

less than 0.25 - 0.75 inches in length (approximately 0-15.45 day time frame)

Certified By:

OMEGA Laboratories

Requesting Agency:
Health Technologies, Inc.
1501
TX, 76201
Telephone: (

LAN#:
Specimen ID:
Reason For Test: Other
Date Collected: 1/11/2010
Date Received: 1/12/2010
Date Reported: 1/14/2010

Donor ID: _____ SSN: _____

Test(s) Requested: **Hair 5 Drug Panel**

The standard Hair 5 Drug Panel Test includes the testing of the 5 major drug classes.
These include:
Amphetamines - Amphetamine, Methamphetamine and Ecstasy (MDMA)
Cocaine - Cocaine/Cocaine Metabolites
Opiates - Codeine, Morphine, Heroin Metabolite
Phencyclidine(PCP)
THC Metabolite(Marijuana)

Drugs Tested For	Result	Screening ELISA Cut Off *picograms per milligram*	Confirmation Cut off *picograms per milligram*
Amphetamines	Negative	500 pg/mg	500 pg/mg
Cocaine/Metabolites	**Positive**	500 pg/mg	500 pg/mg
Cocaine	**Positive**		500 pg/mg
Benzoylecgonine	**Positive**		50 pg/mg
Cocaethylene	**Positive**		50 pg/mg
Opiates	Negative	300 pg/mg	300 pg/mg
Phencyclidine	Negative	300 pg/mg	300 pg/mg
THC Metabolite	Negative	1.00 pg/mg	0.30 pg/mg

Hair 5 Drug Panel Test Result(s)

Cocaine - Positive **868 pg/mg**
Benzoylecgonine - Positive **162 pg/mg**
Cocaethylene - Positive **88 pg/mg**

A positive result indicates that the drug was identified at a level greater than its above listed cutoff and was confirmed by GC/MS

REPORT NOTATIONS

less than 0.25 - 0.25 inches in length (approximately 0-15 day time frame)

Certified By:
Omega Result Report REV 09.17

D
Laboratory Director

EXPERTOX
drugs-alcohol-poisons laboratory
Ph: 281-476-4600
Fax: 281-950-8856
www.expertox.com

Client: Any Lab Test Now-Round Rock
Addr: 110 N. IH 35
Round Rock, TX 78681
Phone: (512) 246-8378
Contact: Laura Rafferty

First Name:
Last Name:
ID: 465-51-6542
Test Result: Negative

Test Name: Ethyl Glucuronide
Profile: UFR9046
Media: Urine
Reason: Random

Special: A103525
Acc #: 122350013
Collected: 08/20/2012 3:10 PM
Received: 08/22/2012 9:41 AM
Released: 08/22/2012 2:48 PM
Status: Complete

Drug/Test	Lab Result	Confirm Value	Screen Cutoff	Confirm Cutoff	Confirm Type
ETHYL GLUCURONIDE	Negative		500 ng/mL	500 ng/mL	GCMS

Test Comment:

Screen analysis by EIA.

The preceding result has been reviewed and is certified to be as reported. Cory Bergen (Certifying Scientist)

End of Report Laboratory Director: Ernest D. Lyfriss, Ph.D., Forensic Toxicologist Print Date: 08/22/2012 14:52:32 Page 1 of 1

Self Pay
arcpointlabs
Austin,TX

ARCpoint labs
2900 South I-35, Ste 110
Austin,TX 78704

Forensic Drug Testing Report – Confidential

employee:
employee ID: 17891598
Reason For Test: Other
Lab Accession #: 17861598
Specimen ID: A127803
Specimen Type: Hair
Substances test panel: Hair ETG Alcohol 5 panel Test

Collected Date/Time: 07/20/2012 01:45 PM
Lab Reported Date: 07/27/2012
Overall verified result: ***Negative***

Collection Site:
ARCpoint Labs
2900 South I-35, Ste 110
Austin,TX 78704

Laboratory:
ExperTox
1430 Center Park
Deep Park,TX 77536

Comments:

Identifying Mental Illness Issues

- **26.2% of Americans suffer from mental illness.**
- **Ask about any diagnosis and medications.**
  - **DSM-V Diagnosis?**
  - **All medications and how long been on them?**
- **Any treatment or hospitalizations? Arrests?**
- **Use your instincts.**
- **May suffer from more than one mental illness.**
- **Questionable behavior does not mean mentally ill.**



The DSM V and the Old Axis System

-What is the DSM? -Diagnostic and Statistical Manual of Mental Disorders, 5th Edition

-DSM IV- The Axis System

Axis I- Principal Mental Disorder Needing Immediate Treatment (e.g. schizophrenia, bi-polar, major depression)

Axis II- Personality or Developmental Disorder (e.g. narcissistic, antisocial, mental retardation, learning disabled)

Axis III- Medical or Neurological Problems Possibly Contributing to Psychiatric Issues (e.g. asthma, cancer)

Axis IV- Contributing social stressors (e.g. Homelessness, lengthy divorce)

Axis V- Level of Functioning 1 to 100- (100 being no problems, 1 being immediate harm to self or others)



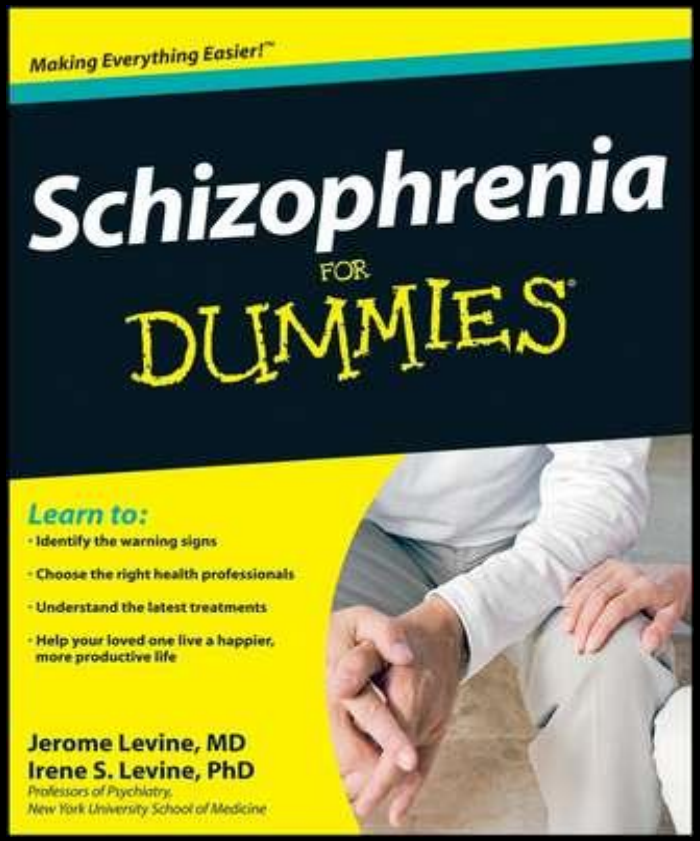
-Under DSM V-

-Axis I-III combined to Single Axis for First 3

-Axis IV and V still evaluated, just use different tools

-Old system created confusion

Mental Disorders- Axis I



- Anxiety Disorders –
  - Panic Disorder, Obsessive-Compulsive Disorder, Post Traumatic Stress Disorder
  - Excessive or Irrational Fear
  - Panic Attacks
- Bipolar Disorder-
  - Manic-Depressive
  - Excessive mood swings from extreme highs to lows
  - Severe episodes may include symptoms of psychosis, delusional thoughts or hallucinations.
- Depression-
  - Loss of interest or hope
  - Feelings of guilt and helplessness
  - Unreasonably low for long periods
- Schizophrenia
  - Profound disruption in cognition and emotion
  - Psychotic manifestations
  - Delusions

Personality and Developmental Disorders- Axis II

- **Mental Retardation or Learning Disabled**
  - ADD, ADHD, Dyslexia
  - Autism Spectrum (Now includes Asperger's Syndrome)
- **Paranoid**
  - Suspicious and mistrusting of people, hostile
  - Blames others and the environment for inadequacies
  - Very sensitive and quick to take offense
- **Schizoid**
  - Withdraws from relationships and social detachment.
  - Has few close friends and appears cold and aloof
  - Seems lonely, Passive and tends to fantasize and daydream
- **Histrionic**
  - Dramatic, emotional, attention-seeking, colorful, and flamboyant
  - Tends to be egocentric, inconsiderate of others, and demanding
  - Manifests irrationality, manipulativeness, excitability, and tantrums
- **Antisocial**
  - Difficulty integrating social norms, laws, and values of society so that there are many problems in the person's history of truancy, school expulsion, delinquency, running away, lying, theft, vandalism, and fighting
  - Charming, has superficial relationships

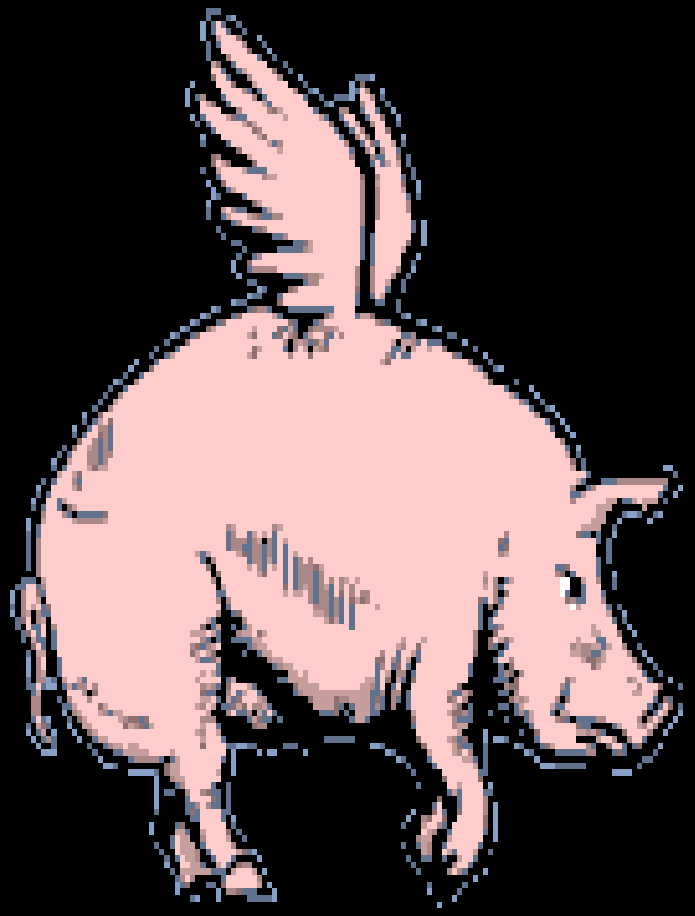


Personality Disorders- Part Deux



- **Borderline**
  - Shows mood shifts, unstable yet intense relationships, many anger episodes with little control, yet controls others
  - self-detrimental behavior such as promiscuity, substance abuse, and self mutilation
  - Complains of identity difficulties, loneliness, and feelings of emptiness
  - Low achievement, manipulative, suicide attempts
  - Intense, unstable relationships
- **Narcissistic**
  - Strives for power and success
  - Can't take criticism, flies into rages
  - Arrogant, egotistical and grandiose
  - Friendships based on how they can benefit from the relationship
  - Preoccupied with success, beauty, wealth, power and/or love
- **Avoidant**
  - Afraid someone will discover the real who they are and reject them
  - Devastated by disapproval and oversensitive to others
  - Afraid of saying or doing something foolish
  - Seeks uncritical acceptance
- **Dependent**
  - Goes to great lengths not to be alone
  - Feels totally helpless, socially isolated
  - Unable to make decisions without help
  - Wants to be liked
  - Will do unpleasant tasks to increase acceptance
  - Lacks assertiveness
  - Indirect expression of feelings

Making Pigs Fly and Dealing with Unreasonable Expectations Without Losing Your Cool



- **Never, ever judge.**
- **Make Your Client See a Therapist, Psychologist, Psychiatrist, Addiction Specialist, etc.**
  - **May not go over well**
  - **Be creative**
- **Figure Out if Your Client, and You, Can Survive a Custody Evaluation or Psychological Testing**
- **Give the Client Choices and let them make the decision.**

  -Gives the client a feeling of control.
- **Use the Empathic Sandwich when breaking bad news.**

Get Help Before It's Too Late



- Hire An Expert to Help You Deal With Your Client
  - Use your expert to guide you through dealing with the client
  - Listen to recommendations for strategy
  - What can the client handle?
- Get Your Client into the Proper Program and Make Sure the Client Complies
  - AA or another 12 step program
  - Therapy or Medication
  - Be Creative (Ketamine Treatment?)
- Testing?
  - Custody Evaluation
  - Psychological or Psychiatric Evaluation

The Right Expert for the Job

- **Make sure your expert is the right choice by asking:**
  1. SPECIALIZES IN THE RIGHT AREA;
  2. LENGTH OF TIME IN THE PROFESSION;
  3. EDUCATIONAL BACKGROUND;
  4. PROFESSIONAL TRAINING;
  5. MEMBERSHIP IN ANY PROFESSIONAL ASSOC.;
  6. PUBLICATIONS OR RESEARCH;
  7. EXPERIENCE AS A WITNESS;
  8. ACADEMIC POSITIONS.





BLOWING AWAY THE COMPETITION

WHEN THE OTHER SIDE HAS THE ISSUE

- -Aggressively Address Issue as Soon as You Are Aware
  - -Can't claim it's a problem if knew and did nothing.
  - -Injunctions, Emergency Orders, Temporary Restraining Orders
- -Request Orders for Treatment
  - -Can use the expert to show severity of impairment
  - -Attack on failure to follow course of treatment
  - -People with mental illness or substance abuse have high rate of relapse.

FIGHTING FOR YOUR IMPAIRED CLIENT IN COURT

- REMEMBER THEY ARE ILL
  - TAILOR REPRESENTATION AROUND THAT FACT AND DON'T PLAY THE DENIAL OR BLAME GAME
  - EDUCATE COURT ON DISEASE
  - NOT A "CHOICE"
- USE SUPPORTIVE WITNESSES
  - SHOW PROGRESS
  - SHOW NO DANGER
- GAL IF CLIENT NOT COMPETENT
- ADVANTAGES OF ILLNESS
  - MAINTENANCE OR DISPROPORTIONATE DIVISION



THE GATEKEEPER OF EXPERTS

DAUBERT V. MERRELL DOW PHARMACEUTICALS, INC., 509 U.S. 579, 590 (1993).

1. Can the Theory or Technique be Tested?
2. Has the Theory or Technique been Subject to Peer Review and Publication?
3. What is the Known or Potential Rate of Error?
4. Is There General Acceptance in the Relevant Scientific Community?

Kumho Tire Co., Ltd. V. Carmichael, 526 U.S. 137 (1999).

1. *Daubert* applies to ALL Expert Testimony.
2. Any Expert Testimony must be Both Reliable and Relevant.



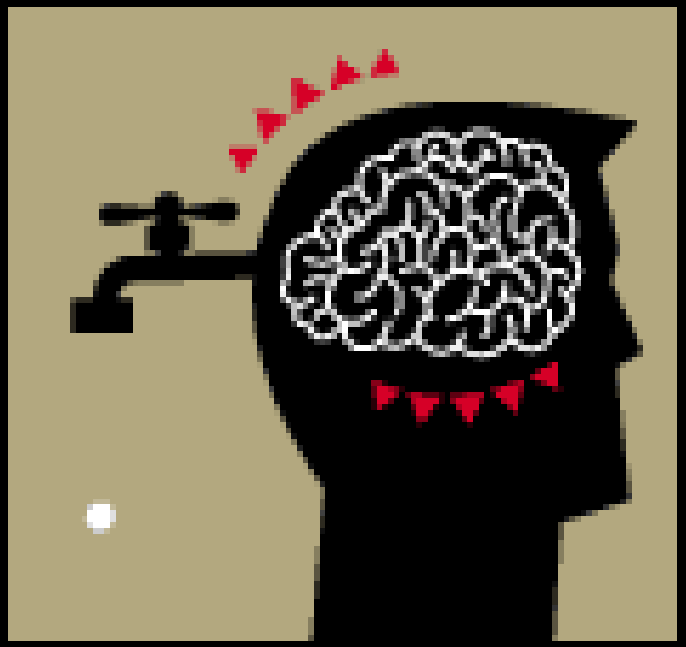
THE DAUBERT/ROBINSON ROADMAP!

1. The Proponent of the Testimony has the Burden of Persuading the Court as to Reliability;
2. The Opponent Must Object on the Record to Preserve Error;
3. The "Gatekeeper" Hearing is Outside the Presence of the Jury;
4. The Trial Court Determines Whether the Expert Testimony is Reliable;
5. Reliable Testimony is Admissible;
6. The Trial Court has Wide Latitude in Determining Admissibility;
7. The Standard of Review is Abuse of Discretion;
8. The Daubert/Robinson/Nenno Inquiries are Flexible and Not Exclusive.



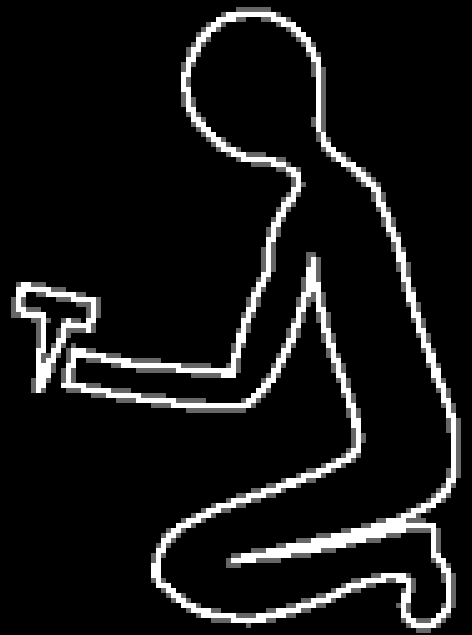
PSYCHOLOGISTS: FORENSIC V. THERAPEUTIC

- **USES:**
  - Custody Evaluations
  - Psychological Evaluations
  - Therapeutic
  - Proving Mental Disability for Maintenance Purposes
  - Cruelty or Abuse Allegations
- **STANDARDS:**
  - A.P.A. Guidelines for Child Custody Evaluations –
    - www.apa.org
  - Texas Rules- www.TSBEP.state.tx.us/rules.html



LICENSED PROFESSIONAL COUNSELOR

- **USES:**
  - **Custody Evaluations/ Social Studies**
  - **Cruelty or Abuse Allegations**
  - **Therapeutic/Counseling**
- **STANDARDS:**
  - **Code of Ethics-**
  - **PARADOX**



DUAL ROLE EXPERTS

- NEVER USE SAME EXPERT FOR THERAPY AND FORENSIC
- WHY NOT?
  - Not the Same Goals
  - Harms therapy
- WHY TEMPTING?
  - One expert for everything!!
  - Knows the history.
- GREAT WAY TO IMPEACH



DON'T BE AFRAID!!!



"Your present circumstances don't determine where you can go, they merely determine where you start"

-Nido Qubein