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I am sometimes asked by attorneys to assist with questions for cross-examination of the other party's mental health witnesses. Recently, a psychologist submitted a supposed rebuttal report to one of mine. I was asked by the attorney representing the targeted parent to assist with some possible lines of questions for this psychologist when they testify.

First thing I did was ask if they had the vitae of this other psychologist. They did. I then read the report and completed a Checklist of Applied Knowledge regarding the report. I then offered a series of questions around themes. I am sharing these possible questions for cross-examination of a mental health professional to offer as a potential example of the types of questions that may be available for use in cross-examining mental health professionals.

The issue isn't what these mental health people say, it's whether they apply the established knowledge of professional psychology. This psychologist didn't. There was no discernable application of any of the established knowledge from any domain of professional psychology, and this would be consistent with the psychologist's vitae.

Of deep professional concern is that the psychologist rendered opinions that were not grounded in any established constructs and principles of professional psychology. This is likely in violation of Standards 2.04 and 9.01a of the APA ethics code. Based on a review of her vitae, this is likely because she doesn't know the established constructs and principles of professional psychology – of particular note in this regard was the absence of applied knowledge from family systems therapy. If the psychologist did not apply relevant professional knowledge because the psychologist lacks this relevant psychological knowledge, this may represent a violation of Standard 2.01a of the APA ethics code.

Family systems therapy is one of the four primary schools of psychotherapy – the others being psychoanalytic (Freud and the couch), humanistic-existential (self-actualization and personal growth), and cognitive-behavioral (experiments with lab rats on reward and punishment). Family systems therapy is the only school of psychotherapy that deals with resolving current family relationships and family conflicts – as such, it is the appropriate school of psychotherapy to apply in resolving family conflict.

The psychologist applied none of the constructs and principles of family systems therapy to their analysis. They basically just made stuff up based on their own personal feelings. One might as well ask a plumber – the plumber won't apply any knowledge from professional psychology either.

Opposing counsel is likely to try to frame Dr. Childress as being some sort of "new theory" that I'm supposedly proposing. That is 100% false. I have no "new theory" – I am simply applying the standard and scientifically established knowledge of professional psychology to a set of symptoms – primarily I'm applying constructs from family systems therapy (triangulation, cross-generational coalition, and emotional cutoff) and from attachment.

The attachment system is the brain system that governs all aspects of love and bonding throughout the lifespan, including grief and loss. A child rejecting a parent is a problem in love-and-bonding – in the attachment system – a child rejecting a parent is an attachment-related pathology.

The other psychologist applied none of the scientifically established knowledge surrounding attachment and attachment pathology to the analysis of an attachment-related pathology. The psychologist applied none of the constructs and principles from family systems therapy to the analysis of high-intensity family conflict. Might as well ask your plumber for their opinion.

My recommendation to the attorney was to begin to attack the psychologist’s credibility during voir dire and then continue to undermine the psychologist’s credibility in cross-examination. Here are various lines of questioning that I offered which might be useful to accomplishing that. I included the answers to the questions so the attorney is aware of what the correct answers are.

Schools of Psychotherapy	
What are the four schools of psychotherapy	
	A: Psychoanalytic (Freud and the couch), humanistic-existential (self-actualization and personal growth), cognitive-behavioral (rats pressing levers, rewards and punishments), and family systems therapy.
Which school of psychotherapy should be used in resolving current family conflicts?	
	A: Family systems therapy.
Who are the major theorists for family systems therapy?	
	A: Salvador Minuchin, Murray Bowen, Jay Haley, Cloe Madanes, Virginia Satir,
Where did you receive your training in family systems therapy?	
	A: (who knows what the psychologist will say – I see no training on their vitae)
Would you say you are more aligned with a Structural approach to family systems therapy described by Minuchin, the Strategic school of Haley and Madanes, or to Bowen’s approach to family systems therapy?	
	A: (who knows what the psychologist will say, I’m not sure they know family systems therapy)
What’s the difference between the Structural, Strategic, and Bowenian approaches to family systems therapy.	

	A: They all agree on the same basic constructs, they differ in emphasis. Minuchin (Structural) emphasizes the structure of the family and boundaries, Haley and Madanes (Strategic) emphasize the role of power in family symptoms, and Bowen (Bowenian) emphasizes the multi-generational transmission of unresolved trauma in the family.
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Constructs from Family Systems Therapy	
In family systems therapy, what is a cross-generational coalition?	
	A: It's when a parent forms an alliance with the child against the other parent. <sup>1</sup> (Minuchin, Haley, Madanes; Appendix 1)
How would you diagnose a cross-generational coalition in the family, what are the symptom features of a cross-generational coalition?	
	A: An inverted hierarchy (child judging a parent), a "favored" parent and "unfavored" parent, a selectively incompetent "favored parent" who can enforce rules under most circumstances – but simply "can't" when it comes to enforcing rules for the children regarding the other parent ("What can I do, I can't force the children to get along with the other parent"). (Minuchin, Haley, Madanes)
In family systems therapy, what is the cause of a cross-generational coalition?	
	A: The allied parent is diverting spousal anger toward the other spouse through the child, the child is being used as a weapon by one spouse in the spousal conflict to obtain power over the other parent. (Minuchin, Madanes)
In family systems therapy, what is an inverted hierarchy?	

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<sup>1</sup> Haley, J. (1977). Toward a theory of pathological systems. In P. Watzlawick & J. Weakland (Eds.), *The interactional view* (pp. 31-48). New York: Norton.

"The people responding to each other in the triangle are not peers, but one of them is of a different generation from the other two... In the process of their interaction together, the person of one generation forms a coalition with the person of the other generation against his peer. By 'coalition' is meant a process of joint action which is *against* the third person... The coalition between the two persons is denied. That is, there is certain behavior which indicates a coalition which, when it is queried, will be denied as a coalition... In essence, the **perverse triangle** is one in which the separation of generations is breached in a covert way. When this occurs as a repetitive pattern, the system will be pathological." (p. 37)

	A: It is when the child becomes empowered by the alliance with one parent into a elevated position above the targeted parent, from which the child feels entitled to judge the adequacy of the targeted parent. (Minuchin)
Are you concerned that the children and father may be in a cross-generational coalition against the mother?	
	A: (who knows what the psychologist will say, but the answer should be, yes).
What is an emotional cutoff?	
	It is when a family member rejects another family member (Bowen) <sup>2</sup>
What's the cause of an emotional cutoff in the family?	
	A: Unresolved multi-generational trauma. The parent's unresolved anxiety surrounding their own childhood trauma carries into current family relationships and overwhelms the boundaries of the child, creating an unhealthy state of psychological "enmeshment" between them that damages "self-differentiation" of individual autonomy in the family. (Bowen)
How would you assess for an emotional cutoff in the family, what are the symptom features of an emotional cutoff?	
	A: A family member rejecting another family member.
Since the children in this family are rejecting a relationship with their mother, would you say that this represents an "emotional cutoff" in the children's relationship with their mother, as described by Bowen?	
	A: Yes. By definition. An emotional cutoff is the rejection of one family member by another family member.

Application of Family Systems Knowledge	
In your report, you didn't discuss the possibility of a "cross-generational coalition" of the children with their father, the apparent inverted family hierarchy of the children judging the adequacy of a parent, or the "emotional cutoff" in the children's relationship with the their mother, why is that? Why didn't you discuss these features from family systems therapy in your report?	
	A: (who knows what she'll say)

<sup>2</sup> Titelman, P. (2003). Emotional cutoff: Bowen family systems theory perspectives. New York: Haworth Press.

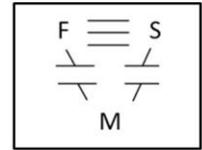
Possible Question: Show the psychologist a picture of Minuchin's structural diagram.

Here is a structural family diagram found on page 42 of Salvador Minuchin's book with Michael Nichols, Family Healing, Strategies for Hope and Understanding. Can you please explain that diagram for me?

Salvador Minuchin: Structural Family Diagram

From page 42

Minuchin, S. & Nichols, M.P. (1993). Family healing: Strategies for hope and understanding. New York: Touchstone.



A: This is a structural family diagram representing the child's **triangulation** into the spousal conflict (triangle pattern: parent-child-parent conflict) through the formation of a **cross-generational coalition** of the son and father against the mother, resulting in an inverted hierarchy caused by the over-empowerment of the child (by the child's coalition with the allied parent), reflected in the child's elevation above the structural line on the same level as the father, with the mother beneath them both, in the structural position of a child in the family hierarchy. The three lines between the father and son reflect an **enmeshed** (psychologically over-involved) relationship of the son and father, and the broken lines between the father and mother and between the son and the mother represents the **emotional cutoffs** in the family relationships.

Would this structural family diagram by Salvador Minuchin represent the family pathology of concern to Dr. Childress?

A: Yes.

### Attachment Knowledge

What is the attachment system?

A: It is the brain system that governs all aspects of love and bonding throughout the lifespan, including grief and loss.

Is the attachment system a primary motivational system of the brain?

A: Yes.

Would a child rejecting a parent represent an attachment-related pathology, a problem in the attachment bonding of the child and parent?

A: Yes

Where did you receive your training in the assessment, diagnosis, and treatment of attachment-related pathology?

	A: (who knows what the psychologist will answer, judging from the vitae they don't have any training in attachment pathology).
Who is John Bowlby?	
	The grand-high expert and originator of attachment theory back in the 1960s through 1980s. His three volumes on the attachment system laid the foundations for the entire field of attachment.
Have you read John Bowlby's three volumes on Attachment?	
	A: (who knows, but probably not)
In the third volume of his attachment series, Bowlby says that, "The deactivation of attachment behavior is a key feature of certain common variants of pathological mourning" (Bowlby, 1980, p. 70). What does that statement mean?	
	A: That when a child rejects bonding to a parent (i.e., the "deactivation of attachment behavior") it is caused by the unresolved processing of sadness, grief, and loss ("pathological mourning").
Do the children in this family appear to evidence a "deactivation of attachment behavior" toward their mother?	
	A: (who knows what the psychologist will say, but the answer is yes, by definition, rejecting a parent is a "deactivation of attachment behavior")
If this attachment bonding pathology between the children and their mother is caused by the inadequate processing of sadness, grief, and loss by the children, is the treatment for that to continue the separation from a bonded relationship to their mother?	
	A: No. The treatment for sadness, grief, and loss is to restore the parent-child bond as quickly as possible.
The attachment systems is described as a "goal-corrected" motivational system, what does that mean?	
	A: The attachment system always – always – maintains the goal of forming an attached bond to the parent. In response to bad parenting it changes <i>how</i> it tries to form this bond, but it always seeks to form an attachment bond to the parent.  This is because of the survival origins in the evolution of the brain's attachment system. Children who rejected parents were eaten by predators. Children who rejected bad parents were more certainly eaten by predators. On the other hand, children who continued to TRY to bond to the bad parent –

	<p>children who maintained the <i>goal</i> of bonding to the bad parent – had at least some chance of forming a bond and not being eaten.</p> <p>It's evolution. It's a brain system. A primary motivational system of the brain. It functions in certain ways, it dysfunctions in certain ways. It always maintains the goal of forming an attachment bond to the parent – always – it's a neurological brain system... a goal-corrected motivational system of the brain.</p>
<p>What if you're wrong in your analysis of this family and the children?</p>	
	<p>A: (the psychologist will probably say, "I don't understand the question.")</p>
<p>Could you be wrong in your analysis? Could there be a cross-generational coalition of the father with the children against their mother that is creating the emotional cutoff in the children's attachment bond to their mother? Is it possible that you are wrong?</p>	
	<p>A: Yes, it's possible (the psychologist might add, "but I don't think I'm wrong" or something like that)</p>
<p>What would be the consequences if you are wrong? Would the children ever be able to recover a bonded relationship with their mother or would they lose a bonded relationship with her for possibly decades?</p>	
	<p>A: (who knows what the psychologist will answer)</p>
<p>Is the love of a mother important to a boy growing up?</p>	
	<p>A: Yes.</p>
<p>John Bowlby describes "internal working models" of attachment, what are internal working models for attachment?</p>	
	<p>A: They are templates we develop based on our childhood relationship with our own parents that then guide us in our approach to developing future intimate relationships as adults.</p>
<p>Would the quality of a boy's relationship with his mother potentially affect the quality of his future relationship with his own wife?</p>	
	<p>A: Yes.</p>
<p>On a scale of 1 to 10, how important to a young boy growing up is his mother's love?</p>	
	<p>A: (who knows what the psychologist will say, but the answer is 10, extremely important – if the psychologist answers less than ten then ask about the importance of a father and see if this matches the importance of a mother, and</p>

	if they do match, then highlight that mothers and fathers are equally important, if they don't match explore why there is a difference).
Are mother's expendable in a boy's life?	
	A: No.
If a boy has a damaged relationship with his mother, should we fix that relationship or should we just let it remain damaged?	
	A: We should fix it.
How soon should we start fixing it? Should we start fixing the mother-son relationship right away, or should we delay fixing things for a while?	
	A: We should start fixing things right away.
So then you think the children's relationship with their mother is a 10 in importance (is equally important as the children's relationship with their father), and that we should start fixing the relationship of the children with their mother right away, is that correct?	
	A: Yes.
If Dr. Childress knows of an approach based in family systems therapy and the attachment system that can restore a normal-range and healthy mother-son bond more quickly and will less family distress than the approach you're recommending, would that be a good thing, to fix things between the mother and children quickly?	
	A: (who knows what the psychologist will say, but the answer is yes – there are no benefits and only damage the longer we delay fixing the parent-child relationship).

Application of IPV Knowledge	
Dr. Childress expressed a concern in his report regarding the possible presence of IPV, Intimate Partner Violence with this family, but you didn't address that issue in your report. Do you see possible issues of IPV in this family situation?	
	A: (who knows what the psychologist will say, the correct answer is yes. If the psychologist answers yes, ask them to elaborate, if they answer no or answer evasively, continue with this set of questions).
Is there anything in the information surrounding this family situation which might have you concerned that the father is using the children as weapons of spousal retaliation against his ex-wife for the failed marriage and divorce?	

	A: (who knows what the psychologist will say)
Would separation from one's children for a long period of time cause grief in a parent?	
	A: Yes.
So the mother in this family would be experiencing tremendous grief at the lost relationship with her children?	
	A: Yes (if the psychologist tries to give a vague answer, ask about the grief of a parent surrounding a child's death).
How quickly would your treatment recommendations restore the mother's bonded relationship with her children?	
	A: (who knows what the psychologist will say, the correct answer is never, it will never happen if the recommendations made by this psychologist are adopted, they are exactly the wrong thing to do).
If the boys continue to reject a relationship with their mother and continue to say they're not ready, is it possible that they might never restore a bonded relationship to her?	
	A: Yes, it's possible.
Would that cause tremendous grief for the mother, to lose a bonded relationship with her children for years, possibly decades, and possibly a lifetime?	
	A: Yes.
Would your recommendations, if followed, potentially harm the mother?	
	A: (I don't know what the psychologist will say, and they are likely to become evasive)
What does Standard 3.04a of the APA ethics code say?	
	A: It prohibits psychologists from harming anyone they work with. <b>3.04 Avoiding Harm</b> (a) Psychologists take reasonable steps to avoid harming their clients/patients, students, supervisees, research participants, organizational clients, and others with whom they work, and to minimize harm where it is foreseeable and unavoidable.
Would your recommendations, if followed, potentially harm the mother by inflicting on her tremendous grief over the loss of her children, a loss that might span years, possibly decades, possibly a lifetime?	

	<p>A: (the answer is yes, it will harm the mother. If the psychologist tries to avoid this, ask again – how long it will take for the psychologist’s treatment recommendations to result in a bonded mother-child relationship with her sons – the psychologist will avoid answering this question, then ask if it is possible it could be years? possibly decades? Possibly a lifetime? – note: nearly everything is “possible,” of course it’s possible.</p> <p>If you care to go a step further on this line, ask what steps the psychologist took in the report to “minimize harm [to the mother] where it is foreseeable and unavoidable”?</p>
<p>Is it Possible? (of course it is, all things are “possible”)</p>	
<p>Is it possible that the children’s rejection of their mother is because of a cross-generational coalition with their father?</p>	
	<p>Yes.</p>
<p>Is it possible that the father is using the children as weapons of spousal revenge and retaliation against his ex-wife, the children’s mother, for the failed marriage and divorce?</p>	
	<p>Yes, it’s possible.</p>
<p>What is that called in professional psychology, when one spouse uses the children as weapons of spousal revenge and retaliation against the other spouse?</p>	
	<p>A: (the psychologist won’t know the answer)</p>
<p>Is it called Intimate Partner Violence? The emotional abuse of the spouse using the children as weapons?</p>	
	<p>A: Yes (the psychologist may give an evasive answer)</p>
<p>You didn’t address the issue of possible IPV pathology in this family, is there a reason you didn’t address the possible IPV concerns noted prominently by Dr. Childress?</p>	
<p>How would you assess for the IPV emotional abuse of a mother by a father, who is using the children as weapons of spousal retaliation and revenge for the failed marriage and divorce?</p>	
	<p>A: (the psychologist won’t know and is likely to become evasive. The answer is by identifying features of possible power, control, and domination by the father toward the mother, and by identifying a cross-generational coalition of the father with the children in the family.</p>
<p>If the concerns of Dr. Childress are accurate regarding the use of the children by the father as weapons of IPV spousal emotional abuse toward his ex-wife, the children’s</p>	

mother, would your recommendations to empower the children to reject their mother be colluding with the spousal emotional abuse of the ex-wife by the ex-husband and father, who is using the children as weapons of spousal revenge for the failed marriage and divorce?
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A: Yes (who knows what the psychologist will say)
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There are additional lines of questions that could be opened, but there are often time limitations to cross-examination that benefit from more limited and focused questioning.

Everyone has an opinion. Your plumber has an opinion. The reason the opinion of a mental health professional is valued is because the mental health professional is supposed to apply the established knowledge of professional psychology to a situation and render an opinion based on the application of the standard and established knowledge of professional psychology.

If the psychologist does not apply any of the established knowledge from professional psychology in forming an opinion, then the opinion of the mental health person is no value. Might as well ask your plumber or hairstylist what their opinions are. The value of the mental health professional's opinion is that it is based on the application of the established knowledge of professional psychology - Bowlby, Minuchin, Beck, van der Kolk, Tronick (attachment, family systems therapy, personality disorders, complex trauma, and the neuro-development of the brain in the parent-child relationship). If no knowledge is applied, then the opinion is of no value.

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## Appendix 1

### Description of Cross-Generational Coalition from Madanes - Changing Relationships: Strategies for Therapists and Coaches

Madanes, C. (2018). *Changing relationships: Strategies for therapists and coaches*. Phoenix, AZ: Zeig, Tucker, & Theisen, Inc.

#### Chapter Three Hierarchy

##### Cross-Generational Coalition

In most organizations, families, and relationships, there is hierarchy: one person has more power and responsibility than another. Whenever there is hierarchy, there is the possibility of cross-generational coalitions. The husband and wife may argue over how the wife spends money. At a certain point, the wife might enlist the older son into a coalition against the husband. Mother and son may talk disparagingly about the father and to the father, and secretly plot about how to influence or deceive him. The wife's coalition with the son gives her power in relation to the husband and limits the husband's power over how she spends money. The wife now has an ally in her battle with her husband, and the husband now runs the risk of alienating his son. Such a cross-generational coalition can stabilize a marriage, but it creates a triangle that weakens the position of both husband and wife. Now the son has the source of power over both of them.

Cross-generational coalitions take different forms in different families (Madanes, 2009). The grandparent may side the grandchild against a parent. An aunt might side with the niece against her mother. A husband might join his mother against the wife. These alliances are most often covert and are rarely expressed verbally. They involve painful conflicts that can continue for years

Sometimes cross-generational coalitions are overt. A wife might confide her marital problems to her child and in this way antagonize the child against the father. Parents may criticize a grandparent and create a conflict in the child who loves both the grandparent and the parents. This child may feel conflicted as a result, suffering because his or her loyalties are divided.