

- Child Custody Checklist -

There are many items to think about and consider as you prepare to get involved, or re-involved, in any custody dispute. This list will help you better organize these items. It has been prepared using all of the training and experience of our 35 years in the field as Custody Evaluators, Expert Witnesses, Authors, and Consultants in Custody Cases all over the United States. (Reprinted from the Experts' Complete Custody Help Kit, by Dr. Barry Bricklin and Dr. Gail Elliot, published by the CustodyLibrary.com)

- 1. Hire the right lawyer, with the right experience, knowledge and training. We have found--during our 35 years in the field--that hiring the correct lawyer is the most important action that you can take. Without the right lawyer nothing seems to work out as well--no matter how much work you put into your case.**
- 2. Get recommendations for the right lawyer. (from your family lawyer, friends, bar association?)**
- 3. Make a list of the other person's weaknesses. The other person is usually your spouse or former spouse, but may be grandparents, foster parents, siblings, or even the State.**
- 4. Make a list of the other person's strengths. This is really important, it is too easy to concentrate on the other person's weaknesses and what they do wrong--here we want you to list what they do right.**
- 5. Make a list of your strengths.**
- 6. Make a list of your weaknesses. Be brutally honest. Only you and your lawyer will see list.**
- 7. List the strengths in your present position from the view of the judge: job, economics, help from parents, etc.**
- 8. List the strengths of the other person in his or her present position.**
- 9. Decide if you should be the first to initiate the suit.**
- 10. Decide if you should try to settle-the case.**
- 11. Write out a Draft Custody Plan. List everything that you want as if you will be able to get everything that you want--you won't get everything but making this list is a good start.**

- 12. Make a list of the negotiable points in your Draft Custody Plan:**
- 13. Decide if you should start negotiating with the other person.**
- 14. Make a list of your bargaining chips.**
- 15. Decide if you should work out a temporary custody plan with the other person.**
- 16. Find out what criteria your family court looks at when awarding custody.**
- 17. Find out if your judge has specific prejudices. (Blond hair, women or men, successful women, athletic looking men, etc.)**
- 18. Find out if the other person is using alienating strategies.**
- 19. If the other person is using alienating strategies, put into effect a plan to counteract these strategies.**
- 20. Decide if the other person may make false allegations in court. What would they be?**
- 21. Decide how to refute any false allegations.**
- 22. Make a list of witnesses that you have to refute potential allegations.**
- 23. Write down, for each witness, how they should dress and act in court.**
- 24. Decide how you should act in court.**
- 25. Choose the clothes you will wear in court.**
- 26. Decide if this is the right time to start dating.**
- 27. Decide if this is the right time to move in with your new significant other.**
- 28. Make a list of the marital assets.**
- 29. Include in the list when each asset came into the marriage.**
- 30. Include how each asset came into the marriage.**
- 31. Calculate how much insurance is in-force that would go to you and your child.**

- 32. Calculate how much insurance you and your child actually need.**
- 33. Medical coverage?**
- 34. Write down the education plans for your child and yourself**
- 35. Make a list of your future potential earnings.**
- 36. Think about what could happen to increase or decrease your future earnings potential.**
- 37. Make a list of the other person's estimated future income.**
- 38. Write down any special earnings potential of the other person.**
- 39. Decide if your child is being bribed.**
- 40. If yes, decide on a course of action to counteract these bribes.**
- 41. Make a list by subject of the important things you have not told your lawyer. You don't want any surprises in court. List arrests, bankruptcy, affairs, fights--everything!**
- 42. Consider if there is a sickness or disability to be considered.**
- 43. Make a list of any of the ways that you can help control legal costs.**
- 44. Decide what to do if the other person wants to relocate.**
- 45. Decide if you may want to relocate, now or later.**
- 46. Decide if you need a Custody Evaluation to help your case.**
- 47. Hire the right evaluator? Get recommendations from your lawyer, friends, etc.**
- 48. Decide if the other person is trying to "get your goat."**
- 49. Consider how it would help the other person if you did get angry.**
- 50. If you energetically follow the checklist above, dig out all of the necessary answers and write them down, and communicate that information to your lawyer, witnesses, etc., you will significantly help your case!**

**--Experts' Complete Custody Help Kit
Dr. Barry Bricklin and Dr. Gail Elliot**