

THIRTY-SECOND JUDICIAL DISTRICT COURT
PARISH OF TERREBONNE
STATE OF LOUISIANA

M. VERSUS

NO.157822

D.

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The deposition of DR. KAREN VAN BEYER,
3350 Ridgelake Drive, Suite 200, Metairie,
Louisiana 70002, taken at her office, in
connection with the captioned cause, pursuant to
the following stipulations before MELISSA M.
EVANS, Certified Court Reporter, on the 14th of
November, 2012, beginning at 2:55 p.m.

1 APPEARANCES:

2
3 FOR M.

4
5 CAROLYN MCNABB
6 THE MCNABB LAW FIRM, APLC
7 254 Barrow Street
8 Houma, Louisiana 70360
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11 FOR D.

12
13 RICHARD DUCOTE
14 RICHARD DUCOTE & ASSOCIATES, PLC
15 4800 Liberty Avenue
16 Third Floor
17 Pittsburgh, PA 15224
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S T I P U L A T I O N

It is hereby stipulated by and among
counsel for plaintiff and counsel for defense,
that the deposition of

DR. KAREN VAN BEYER
be taken before MELISSA M. EVANS, Certified Court
Reporter, for all purposes, pursuant to notice and
to the provisions of the appropriate statutes of
the Code of Civil Procedure of the State of
Louisiana.

The parties hereto waive all formalities
in connection with the taking of said deposition,
except the reading and signing thereof, the
swearing of the witness, and the reduction of the
questions and answers to typewriting.

Per Article 1443(D) of the Louisiana Code
of Civil Procedure, counsel for all parties
reserve all objections until trial or other use of
the deposition.

* * *

1 DR. KAREN VAN BEYER, after having been
2 first duly sworn, was examined and did testify as
3 follows:

4 EXAMINATION BY MR. DUCOTE:

5 Q Okay. Would you state your name and
6 address, please?

7 A My name is Karen van Beyer. My address is
8 3350 Ridgelake Drive, Suite 200, Metairie
9 Louisiana 70002.

10 MR. DUCOTE:

11 I'm going to go ahead and attach
12 a copy of the notice to the
13 deposition.

14 And I assume, Ms. McNabb, usual
15 stipulations?

16 MS. McNABB:

17 Yes.

18 MR. DUCOTE:

19 Which means all objections,
20 except to form -- well, let's do this:
21 You want to make -- why don't we make
22 all of our objections on the record at
23 this time during the course of the
24 deposition if you have any objections.

25 MS. McNABB:

1 It might make the deposition last
2 a little bit longer, but --

3 MR. DUCOTE:

4 Why don't we do that? I don't
5 know that we have to argue them and
6 all. Just so there's no confusion. I
7 don't know. That's my suggestion.

8 MS. McNABB:

9 Well --

10 MR. DUCOTE:

11 Well, I would invite you to do
12 that.

13 MS. McNABB:

14 Why don't you do it the way you
15 want, and I'll do it the way I want.
16 I'll reserve my right to object later.

17 MR. DUCOTE:

18 Okay. No problem.

19 MS. McNABB:

20 Except as to the form of the
21 question and whatnot.

22 MR. DUCOTE:

23 Okay.

24 EXAMINATION BY MR. DUCOTE:

25 Q Dr. van Beyer, I'm sure you know the

1 purpose of the deposition is to allow me
2 and Ms. McNabb to ask you questions about
3 this case. I'm going to ask you to do a
4 couple of things so the deposition runs
5 smooth. The first is to wait until I
6 finish asking the question before you start
7 to answer the question. You have to answer
8 in words as opposed to sounds or gestures.
9 If you don't understand a question I ask
10 you, let me know and I'll try to rephrase
11 it in a way that makes sense. And if you
12 do understand the question, try to answer
13 it as fully as possible. At the conclusion
14 of the deposition, after it's transcribed,
15 you'll have a right to read and sign the
16 deposition or you can waive that. And you
17 can decide now or later about that. Okay?

18 A Okay.

19 Q Now, in the case of Arcement versus
20 Arcement, did you conduct an evaluation to
21 determine if Hailey Arcement was sexually
22 abused by her father?

23 A Hailey?

24 Q Yes.

25 A I did not.

1 Q Okay. Did you conduct an evaluation to
2 determine if Haven Arcement was sexually
3 abused by --

4 A I did not.

5 Q -- her father? Okay. Hang on. Wait
6 until I finish asking the question before
7 you answer.

8 A Okay.

9 Q Did you do an evaluation of Haven Arcement
10 to determine if, in fact, she had been
11 sexually abused by her father?

12 A No, I did not. Sorry. I didn't -- when
13 you drop your voice, I assume you're
14 finished.

15 Q Okay. Let me do it again so we're real
16 clear. I apologize for dropping my voice.
17 Have you ever done an evaluation of Haven
18 Arcement to determine if she had been
19 sexually abused by her father?

20 A No, I did not.

21 Q Have you ever done an evaluation of Harmony
22 Arcement to determine if she had been
23 sexually abused by her father?

24 A No, I have not.

25 Q Now, have you ever interviewed Haven

1 Arcement?

2 A Individually, no.

3 Q Have you ever interviewed Harmony Arcement?

4 A Individually, no.

5 Q Now, you did interview Hailey Arcement --

6 A I did.

7 Q -- did you not? Okay. You jumped ahead a
8 little bit on that.

9 A Mr. Ducote, if you will indicate that you
10 have finished your sentence by nodding your
11 head and letting me know you've finished,
12 because you keep adding dependent clauses,
13 which is fine, but I just need to know when
14 you're done with your sentence.

15 Q Right. And it's fine conversationally, and
16 your answers are -- in a conversation are
17 appropriately placed. It's just there
18 needs to be a clear break for the purposes
19 of the court reporter. So I'll be a little
20 more careful.

21 A Thank you.

22 Q Now, did you interview Hailey Arcement?

23 A Yes, I did.

24 Q How many times?

25 A One time.

1 Q How long did the interview last?

2 A A little bit less than an hour.

3 Q And do you have notes --

4 A Yes. Oops.

5 Q Do you have notes from your interview with
6 Hailey?

7 A I do.

8 Q And that was on May 23rd, 2012, correct?

9 A That's correct.

10 Q Now, can you just pull your written notes
11 on Hailey's interview of May 23rd, 2012?

12 A Yes.

13 Q Okay. And do you have before you the
14 report of July 12th, 2012, that you
15 prepared for the Court?

16 A Yes.

17 Q Okay. Now, I'm going to refer to page 12
18 of your report concerning your individual
19 session with Hailey. Now, at this point I
20 want to go back and ask you one more
21 question. I've asked you about the three
22 girls individually and whether or not you
23 had conducted an evaluation of them to
24 determine if they had been sexually abused
25 by their father, and you indicated no. Did

1 you conduct any sort of evaluation in the
2 Arcement case to determine if any of the
3 Arcement children had been sexually abused
4 by their father?

5 A I did not conduct a sexual abuse
6 investigation of any of the children.

7 Q Okay. And when you say "investigation,"
8 would that also include the term,
9 "evaluation" in the nature of a
10 psychological evaluation process?

11 A No.

12 Q Okay. And I asked that question
13 inartfully. Let me ask it again. Did you
14 conduct any sort of psychological
15 assessment or evaluation in the Arcement
16 case whatsoever to determine if any of the
17 Arcement children had been sexually abused
18 by their father?

19 A No.

20 Q Now, on page 12 of your report of
21 July 12th, 2012, I'm going to read you a
22 quote. It says -- under individual session
23 with Hailey, the fourth full paragraph, you
24 say, "At dad's house he is mean." Now, I'm
25 quoting from your report. Is that what

1 Hailey said to you?

2 A Yes, but I will be glad to check from my
3 interview, which is, I assume, why you
4 wanted me to have it in front of me.

5 Q Exactly.

6 A "He is mean."

7 Q Okay. Now, I'm not a psychologist, but
8 when Hailey told you, "My dad is mean," did
9 you ask her, "Well, how is he mean? What
10 does he do that's mean?"

11 A Uh-huh.

12 Q Okay. You have to answer in words.

13 A Yes, I did.

14 Q And is that reflected in your notes?

15 A Yes.

16 Q Did you ask her that?

17 A Uh-huh.

18 Q Is that reflected in your notes?

19 A Yes.

20 Q And what did she say?

21 A "He is mean. He is never with us. He is
22 sleeping or doing something that excludes
23 us. He doesn't play with us."

24 Q Anything else?

25 A Nope.

1 Q Okay. Well, in the same paragraph on page
2 12 of your report you have a sentence or
3 two sentences -- and I'll quote from your
4 report. You say, "He is mean to us. He'll
5 take Harmony and Haven into a room and whip
6 them with a belt at night."

7 A Uh-huh.

8 Q You have to answer in words.

9 A What was the question?

10 Q You said, "uh-huh."

11 A You were asking did I write that in my
12 report. Yes, I did.

13 Q Okay. Now, is that a quote from Hailey?

14 A It is a quote from Hailey.

15 Q Okay. Now, did you ask her any more
16 questions about the two sentences I just
17 read to you?

18 A I did.

19 Q Okay. And that's reflected in your notes?

20 A Yes.

21 Q What questions did you ask Hailey in
22 response to her saying, "He is mean to us.
23 He'll take Harmony and Haven into a room
24 and whip them with a belt at night."

25 A I asked her then, "What happens with the

1 children? What happens with your sisters?"

2 Q And that's reflected in your notes?

3 A The question mark is. I don't always write
4 my questions down. I write the answer to
5 the question.

6 Q Okay. So you have a question mark in your
7 notes after that statement?

8 A Uh-huh.

9 Q Do you have an answer?

10 A Yes.

11 Q Okay. And what was the answer?

12 A The answer is: "Haven plays by herself over
13 there, and Harmony plays with me." That's
14 in answer to the question, "What happens?"

15 Q Okay. But did you ask for any more details
16 about whipping them with the belt?

17 A No.

18 Q Okay. Now, you --

19 A Let me revise that, if I may.

20 Q Okay.

21 A I asked her -- that's not directly in
22 response to that particular question, but I
23 did ask her, "What seems to aggravate your
24 dad?"

25 Q And I was going to get to that next.

1 A Okay.

2 Q Now, did she say that her dad was
3 aggravated?

4 A No. That's my word -- that's my phrase.

5 Q So you asked her, "What aggravated your
6 dad?"

7 A Uh-huh.

8 Q Is that correct?

9 A Yes. Actually, not -- I said, "What
10 aggravates your dad?"

11 Q Well, okay. I'm looking at your report.
12 What you say in your report is, "I asked
13 what aggravated her dad."

14 A Yeah.

15 Q Is that what you asked her?

16 A No. I asked her what aggravates her dad.

17 Q And when you say "aggravated him," were you
18 referring to him taking Harmony and Haven
19 into a room and whipping them with a belt?

20 A I was referring to that and to her saying
21 that he was mean.

22 Q Okay. Now, again, I'm not a psychologist,
23 but if you say, "what aggravates him,"
24 doesn't that suggest to them some sort of
25 explanation or justification for his

1 behavior?

2 A No.

3 Q Did you convey to them that you were asking
4 her -- or convey to Hailey that you were
5 asking her about the whippings with the
6 belt?

7 A I conveyed to Hailey that we were going to
8 talk about dad's house and what happens at
9 dad's house, and this is all in the context
10 of her letting me know what happens at
11 dad's house.

12 Q Okay. When you said, "What aggravates your
13 dad?"

14 A Uh-huh.

15 Q But my question is: Was that specifically
16 directed -- and maybe you answered this
17 already. Maybe I didn't understand. Was
18 this referring directly to her reporting to
19 you that he takes Harmony and Haven into a
20 room and whips them with a belt?

21 A Not directly. It flowed from the
22 conversation that we were having.

23 Q Okay. And then you have in your report on
24 page 12, "I asked what aggravated her dad.
25 She replied that he drinks and is tired

1 from work. He called her the 'B' word like
2 her mom. He's always saying things about
3 their mom." You wrote that, did you not?

4 A Well, yes, Mr. Ducote.

5 Q And forgive me for being a lawyer. I just
6 have to take these things step by step.

7 A I can barely do so, but I will.

8 Q And Hailey was how old at the time?

9 A I have to look and see because I don't
10 remember exactly. Hailey was 12 years old
11 at that time.

12 Q Okay. She's intelligent?

13 A She's very bright, yes.

14 Q And articulate?

15 A Quite articulate.

16 Q Now, when she told you as you report on
17 page 12 of your report, "He drinks and is
18 tired from work," did you ask her any
19 questions specifically to explain that or
20 to amplify what she was talking about or
21 get any more details?

22 A No.

23 Q How about when Hailey told you that he
24 calls her the "B" word like her mom? Now,
25 do you know what the "B" word is?

1 A Bitch.

2 Q Now, this little girl is 12 years old, and
3 she tells you that her father calls her,
4 the 12-year-old girl, a bitch like her mom?

5 A She said the "B" word.

6 Q But you knew what she meant, right?

7 A Yes, I did.

8 Q Now, did you understand her to mean that he
9 calls her the "B" word like he calls her
10 mom the "B" word?

11 A Exactly.

12 Q Did you ask her any more details? How
13 often? How many times does this happen?
14 Anything like that?

15 A No, I did not.

16 Q Now, then she tells you -- and you have
17 this in your report -- "He's always saying
18 things about their mom." Did you ask her,
19 "What types of things does he say about
20 your mom?"

21 A Not at that point, no.

22 Q Did you ask her at a later point?

23 A In this whole conversation there was other
24 complaints that she made, but I did not
25 specifically ask her about that.

1 Q Okay. So what are the other complaints
2 that she made?

3 A She said that, referring to dad's house --
4 you understand the context is we're talking
5 about dad's house?

6 Q Right.

7 A "It's completely opposite of mom's. We
8 can't even get snacks. He keeps the drinks
9 outside and he won't go get them. If you
10 get lemonade yourself, he fusses you."
11 Those were some of the complaints that she
12 made.

13 Q Now, I want to focus on this paragraph. "I
14 asked what aggravated her dad. She replied
15 that he drinks and is tired from work. He
16 called her the "B" word like her mom. He's
17 always saying things about their mom."
18 Now, did you ever go to Mr. Arcement and
19 say, "Did you ever call Hailey a bitch?"

20 A I did not ask him, "Did you ever call
21 Hailey a bitch?"

22 Q Did you ask him, "Do you ever call their
23 mom a bitch?"

24 A No, I did not ask him.

25 Q Did you ask him if he's always saying

1 things about their mom?

2 A No, I did not.

3 Q Okay. Let's go to the last paragraph on
4 page 12. You say, "Stepmother is usually
5 at work." That's her father's wife, right?

6 A That's correct.

7 Q And you say, "Hailey was fine with her,
8 then she started to get mean." Did you ask
9 her, "Well, what did she do to start to get
10 mean?"

11 A Later on in this conversation that we're
12 having, she's explaining other things that
13 happened, and she said about her
14 stepmother, once again, that she does fuss
15 at them and she did grab her arm and bruise
16 her. And I said, "Well why did that
17 happen?" And she said, "I was fine with
18 her, but then she started being mean." And
19 then she referred to Bailey. "Bailey is
20 okay, but she tells on me."

21 Q Okay. Go back to the thing about grabbing
22 her arm. What did she say?

23 A She said that her stepmother did grab her
24 arm and bruise her.

25 Q Okay. Is that in your report?

1 A Not specifically, no.

2 Q Well, wouldn't that be an important thing
3 to put in your report, that the
4 stepmother -- the child says the stepmother
5 grabbed her arm and left a bruise on it?

6 A I could have put that in the report.

7 Q Did you intend to leave it out of the
8 report? Or was that just an error of
9 omission?

10 A In writing up a report, I put in what I
11 feel is particularly pertinent. You may
12 call it an error of omission.

13 Q Well, did you make a conscious decision to
14 keep it out of the report because you
15 didn't think that was pertinent?

16 A No.

17 Q It was just inadvertent?

18 A No.

19 Q It was intentional?

20 A No. When I'm writing up a report, I go
21 through my notes and I extract from my
22 notes essentially a summary, and I don't
23 write all of my notes in the report.

24 Q Okay.

25 A So I selected from this what I felt was

1 pertinent.

2 Q Okay. So -- and maybe I've already asked
3 this a couple of ways, but I'm not sure I
4 understand the answer. And I think maybe
5 I'm not asking it in a clear way. Why did
6 you not include in the report that Hailey
7 said her stepmother grabbed her arm and
8 bruised it?

9 A Well, asked and answered.

10 Q Well, that's a nice attorney objection,
11 but --

12 A I did answer your question.

13 Q You decided that wasn't pertinent; that is
14 your answer?

15 A No. Mr. Ducote, you cannot put words in my
16 mouth.

17 Q I'm not trying to put words in your mouth.

18 A You just did. You told me what I decided.
19 No, I did not decide that.

20 Q I'm asking you an open-ended question. And
21 I'll ask it one more time in a way that I
22 think and I hope makes sense. You have in
23 your notes that Hailey told you her
24 stepmother grabbed her arm and bruised it,
25 and that's not in your report. And that's

1 what I'm asking you, why did those words
2 not make it into your report?

3 A Because what I do in my report is I give
4 the gist of what the children are saying.
5 I do not report every word they said. So I
6 gave the gist of her complaints about her
7 stepmother also being mean, not being good
8 to her.

9 Q Okay. And you asked the stepmother about
10 that?

11 A I asked the stepmother about that and many
12 other things.

13 Q Okay. But did you ask the stepmother,
14 "Hey, did you ever grab Hailey's arm and
15 bruise it?"

16 A No, not specifically.

17 Q Did you ask Mr. Arcement if he drinks?

18 A That is part of the questionnaire that he
19 fills out, so, yes, it's in the
20 questionnaire.

21 Q Okay. Do you have the questionnaire?

22 A Yes, I do.

23 Q Okay. Let's look at that.

24 A Are we done with this part? Can I shut
25 this page?

1 Q No, no, no. Don't be so optimistic.

2 A "Do you drink alcohol at all?"

3 "Yes."

4 "If yes, what do you drink and how
5 much?"

6 "Beer. A 12 pack lasts about two
7 months. At gatherings or occasionally,
8 socially."

9 Q Okay. And that was Mr. Arcement's answer
10 in the written questionnaire, right?

11 A That's correct.

12 Q Now, did he fill that out before or after
13 you interviewed Hailey?

14 A I believe he filled it out before.

15 Q Okay. Now, when Hailey told you about him
16 drinking, did you -- did you have all the
17 information that you thought was important
18 by looking at his questionnaire? Is that
19 why you didn't ask him directly about it?

20 A No.

21 Q Okay. Why didn't you ask him directly?

22 A Would you like me to tell you how I write a
23 report?

24 Q No. I would like you to answer my
25 question. Why did you not ask Mr. Arcement

1 directly to respond to what Hailey was
2 saying about him drinking?

3 A That is not the process that I go through
4 in conducting an evaluation.

5 Q Okay. Now, I want to go to page 13 of your
6 report. In the second full paragraph you
7 say, "When she --" referring to Hailey --
8 "fell on top of Bailey" -- "When she fell
9 on top of Bailey, her father made her sit
10 over a bin and sat on her." Did you ask
11 her any more details about that, to
12 describe the bin, how it felt when it
13 happened, or anything like that?

14 A No.

15 Q Did you ask Mr. Arcement whether or not
16 that happened?

17 A Yes.

18 Q Okay. And that's in your notes?

19 A I did ask him, yes.

20 Q Is that in the report anywhere where you
21 say, "Oh, I asked Mr. Arcement about what
22 Hailey said about the bin"?

23 A Mr. Arcement told me about that. And I
24 think it was before I actually spoke to
25 Bailey, so he had already talked to me

1 about that.

2 Q Do you have in your notes what Mr. Arcement
3 said about this incident?

4 A Yes, I do.

5 Q Okay. And can you read that, please?

6 A Yes. Okay. I'm mistaken. It must have
7 been the stepmother that told me about
8 that. Because one of them had told me
9 about that. I did not go back from her and
10 go back and ask him about it. I think --
11 if I can just check this -- yes. I spoke
12 to Lisa Arcement, the stepmother, after I
13 had seen separately Hailey and I seen them
14 all together. So she was one of the last
15 people I spoke to, so she then was the one
16 that I asked about that incident.

17 Q Okay. And is that in your report, asking
18 her about that incident? Or is that in
19 your notes?

20 A It's in my notes.

21 Q Okay. Could you go to that, please, and
22 could you read me whatever you say about
23 your discussion with Lisa about what Hailey
24 told you about the bin and her father
25 sitting on her?

1 A Well, I know that one of -- I'm not finding
2 it in my notes, but I know that one of them
3 told me about the incident, which was
4 that -- and it might have -- that she
5 was -- they were playing with something
6 like a Nerf gun and Hailey was upset that
7 her dad had shot at her with the Nerf gun
8 and that she had bumped into, pushed her
9 stepsister and her stepsister had fallen
10 and then the dad had shown her what it felt
11 like. Now, I'm not finding it exactly in
12 my notes, but one of them told me about
13 that.

14 Q You don't know who told you?

15 A I'm not sure. I think it was the dad that
16 told me -- or it could have been the
17 stepmother. I don't recall exactly.

18 Q But we do know --

19 A But, obviously --

20 Q We do know what we have written in your
21 report that Hailey told you. We don't have
22 either your report or your notes what
23 anybody else said about that; is that
24 correct?

25 A Not in my notes. In my memory.

1 Q Okay. Now, did you ask anybody other than
2 Hailey -- well, you didn't ask Hailey about
3 the details, but did you ask anybody in the
4 family, either Mr. Arcement or Lisa or
5 Bailey, whether or not Mr. Arcement sat on
6 Hailey over the bin?

7 A What Bailey said or which either of them in
8 their conversation told me, I believed that
9 he had done something, but I don't know
10 exactly what, to demonstrate to Hailey that
11 she had pushed and caused her stepsister to
12 fall down.

13 Q Okay. So, in your mind today, he may well
14 have sat on her, correct?

15 A No.

16 Q Well, how do you know that?

17 A I don't know that she sat -- in my mind
18 today, I do not know that he sat on her,
19 no, I don't.

20 Q Well, you said he did something on the bin?

21 A He did something to teach his child a
22 lesson.

23 Q Okay. And was it, from your perspective,
24 positive parenting whatever he did? Or do
25 you know?

1 A Is that positive parenting? I would not
2 label that positive parenting.

3 Q Okay. But to get back to my question, the
4 only information, as I appreciate it -- and
5 tell me if I'm wrong -- is that Hailey told
6 you he sat on her? We have that piece of
7 data. Hailey said, "He sat on me over the
8 bin." Now, do you have any data in your
9 records that addresses the question from
10 somebody else whether or not he sat on her?

11 A Not that I can find at this moment.

12 Q Now, going back to the same paragraph on
13 page 13, you say -- you write, "After she
14 talked to the judge, her father read to her
15 from the bible and said that the ravens
16 would pick out her eyes for lying. He
17 threatened to call the Court about her
18 grades. He said all of the family lied to
19 hurt him. He said this at her school, too.
20 She was afraid her mom would go to jail."
21 You wrote all that in your report, right?

22 A I did.

23 Q Okay. Now, what does this refer to?
24 "After she talked to the judge," what was
25 that about?

1 A I assume that there was a hearing in which
2 she spoke to the judge.

3 Q And do you know what she said to the judge?

4 A Certainly not.

5 Q Did you ask her?

6 A About the hearing? No, I did not ask her
7 about the hearing.

8 Q Okay. Well, this is a pretty significant
9 statement from a child, right, if, in fact,
10 her father did do such, right?

11 A It is part of the picture that she is
12 painting about her father, and that is
13 significant, yes.

14 Q Okay. Now, so -- but it didn't -- were you
15 interested in knowing what she had talked
16 to the judge about, whatever prompted her
17 father telling her that the ravens would
18 pick out her eyes?

19 A No.

20 Q It didn't interest you?

21 A I was not going to ask her about her
22 interview with the judge, no.

23 Q Okay. Did you ask anybody about her
24 interview with the judge?

25 A No, I did not.

1 Q Okay. "The ravens would pick out her eyes
2 for lying," did you ask Mr. Arcement if he
3 told her that?

4 A No.

5 Q Did you ask Hailey, "Well, when you talked
6 to the judge, were you telling the truth?"

7 A No.

8 Q "He threatened to call the Court about her
9 grades." Did you ask her for any details
10 about that?

11 A No.

12 Q Did you ask Mr. Arcement about that?

13 A No.

14 Q Okay. Next sentence: "He said all of the
15 family lied to hurt him." Did you ask
16 Hailey for any more details about that?

17 A No.

18 Q Did you ask Mr. Arcement about that?

19 A Mr. Ducote, I already indicated I spoke to
20 Mr. Arcement prior to this, not after this.

21 Q But you didn't talk to him at all? Was
22 there any reason you couldn't go and ask
23 him about these things Hailey was telling
24 you?

25 A I could have.

1 Q Now, she also said -- this is what you're
2 saying -- "He said this at her school,
3 too." Did you ask her for any details?

4 A I believe she gave me a few more details
5 about that.

6 Q Okay. Is that in your notes? Could you go
7 to that, please?

8 A It could be. This is what she said
9 regarding that, "He threatens her about
10 telling the Court about her grades. He
11 said all her family lied to hurt him. He
12 also said this at school. Hailey cried,
13 and the teacher comforted her. The
14 teacher, Ms. Cage, asked her what she
15 wanted to do and told her that her mom
16 would not be arrested. Mom came and talked
17 and was able to check her out. The
18 policeman came and said mom would not go to
19 jail."

20 Q Okay. Now, so my question was: What is he
21 saying at school -- at her school; do you
22 know?

23 A I don't know what he said at her school.

24 Q Did you ask her?

25 A She was referring to the conversation -- to

1 the previous part of the conversation.

2 Q About everybody lying?

3 A About everybody lying.

4 Q Okay. And then you say, "She was afraid
5 her mom would go to jail." Did you ask her
6 why was she afraid her mom would go to
7 jail, where that came from?

8 A She said in the course of this that her
9 father threatened that her mother would go
10 to jail.

11 Q Okay. But you don't have that in your
12 written report, do you?

13 A In the report to the Court?

14 Q Yes.

15 A No.

16 Q Now, did you ask Mr. Arcement, "Hey, did
17 you ever tell Hailey that her mom was going
18 to go to jail?"

19 A No, I did not.

20 Q Did you ask Lisa anything about that?

21 A No.

22 Q Okay. Let's take this paragraph. And I'm
23 going to read you this paragraph again.

24 "After she talked to the judge, her father
25 read to her from the bible and said that

1 the ravens would pick out her eyes for
2 lying. He threatened to call the Court
3 about her grades. He said all the family
4 lied to hurt him. He said this at her
5 school, too. She was afraid her mom would
6 go to jail." And then you added that she
7 told you -- and this is not in your report,
8 but it's in your notes -- you said her
9 father told her her mom would go to jail.
10 Can you pull out of that paragraph I just
11 read to you all of the positive parenting
12 on Mr. Arcement's part that's reflected in
13 there?

14 A No.

15 Q There is none, right? This is all pretty
16 bad stuff, right?

17 A This is -- these are the complaints that
18 she had about her father, yes.

19 Q And if this is true, this is serious stuff,
20 right, bad stuff?

21 A No. You are --

22 Q It's good stuff?

23 A You are categorizing this as bad. This is
24 part of what went on. This is part of the
25 picture that she was painting about what

1 happened with her father. I am not judging
2 any of this.

3 Q Okay. Well, let me ask this -- maybe I'm
4 not using the correct psychological term --
5 is this healthy interaction between a
6 father and his daughter, if, in fact, these
7 things occurred?

8 A If, in fact, these things happened exactly
9 as she said, no, it was not a healthy way
10 to try to shape his child's behavior.

11 Q In fact, it's very damaging, is it not?

12 A No. I do not know how damaging it was. I
13 don't know if it was true that he said all
14 of these things. This is what she reported
15 to me, and it was a concern, and I took
16 that into consideration. But.

17 Q you didn't ask --

18 A You can't ask me to make a value judgment.

19 Q Okay. And I suppose somebody might think
20 this is positive parenting, I suppose. I
21 don't know who, but -- but you didn't do
22 anything to try and find out from any of
23 the other family whether this stuff
24 happened, as I understand it, right?

25 A I talked to Bailey. I talked to the

1 stepmom following this.

2 Q And you asked them specifically about these
3 things?

4 A About the ravens? Not specifically.

5 Q How about any of these things: The ravens,
6 the calling the Court about her grades,
7 telling her all the family lied to hurt
8 him, saying these things at school and
9 saying that her mom would go to jail?

10 A I did not go through the list of the things
11 that she said and ask her stepmother about
12 all of those things or stepsister.

13 Q Did you ask them about any of those things?

14 A About those things? No.

15 Q Okay. Let's go to the next full paragraph
16 on page 13. You say, "Hailey remembers her
17 parents fighting before the little ones
18 were born." Then you have in parenthesis
19 "she would have been five years old,"
20 closed parenthesis. "She saw her father
21 choking her mother, kneed her and left a
22 big bruise."

23 A Yes.

24 Q Now, is that fighting? Like if the father
25 chokes the mom and knees the mom and leaves

1 a big bruise, do you consider that the two
2 of them fighting?

3 A I would not characterize that statement as
4 fighting, no.

5 Q Now, do you consider yourself an expert on
6 domestic violence?

7 A That is not my specific area of expertise,
8 as you well know. It is something that I
9 have had education in. It is something
10 that I teach about. It is something that
11 is part of the coursework that I have taken
12 at LSU and at Tulane in psychiatry as well
13 as social work.

14 Q Wouldn't it be pretty damaging for a child
15 to see her father choking her mother and
16 kneeing her mother?

17 A Well, I was not sure whether this was
18 something that she had remembered at that
19 point or whether she was remembering
20 something that her mother told her.

21 Q Okay. So, of course, given the fact that
22 you did not know which of those two things
23 it was, you asked her more questions about
24 it to find out?

25 A No, I did not.

1 Q Oh, okay. Did you ask --

2 A That's probably mine.

3 --INTERRUPTION--

4 Q Okay. Did you ask anybody else in the
5 family, "Hey, did Mr. Arcement ever choke
6 Ms. Arcement" -- now Ms. Ratliff -- "knee
7 her, leave a big bruise," anything like
8 that?

9 A Ms. Arcement had already told me those
10 things.

11 Q Okay. So you never asked Mr. Arcement,
12 right?

13 A Specifically about that? No.

14 Q Now, are you aware that under Louisiana law
15 in criminal cases that choking is a form of
16 domestic violence that has an enhanced
17 penalty, that's even a more severe crime
18 than just beating because choking is such a
19 bad thing for somebody to go through? Are
20 you aware of that?

21 A I will take your word for it.

22 Q Now, do you agree that kids, even kids who
23 go through abusive situations with parents,
24 feel conflicted; sometimes they want to see
25 them, sometimes they don't; they love them,

1 but they don't feel safe; and that accounts
2 for a lot of back and forth about
3 visitation and their feelings about
4 visitation? Would that be a fair
5 statement?

6 A Will you say that whole sentence over
7 again, please?

8 MR. DUCOTE:

9 Can I have it read back?

10 (Whereupon the requested material was read by
11 The court reporter.)

12 A The first part is an absolutely fair
13 statement, yes.

14 Q Now, again, on page 13 of your report, the
15 last paragraph, under your -- before the
16 sentence, "Interview with Hailey." You
17 say, "I asked Hailey if her dad going to
18 parenting classes might help." Now, how
19 would this child be able to assess the
20 efficacy of "parenting classes" by who
21 knows who, given what curriculum? I mean
22 how do you ask a child this age to assess
23 whether parenting classes would help her
24 father?

25 A I didn't ask her to assess that.

1 Q Well, you said, "I asked Hailey if her dad
2 going to parenting classes might help."
3 What did that mean?

4 A It means I asked her if she thought it
5 would help dad and would help her with her
6 dad. And she said, yes.

7 Q Well, how would she know that?

8 A I'm not asking her to make an evaluation of
9 parenting classes. I'm just asking, in her
10 opinion, would it help. She said, yes.

11 Q Well, what -- did you define parenting
12 classes?

13 A No, sir.

14 Q Well, what particular parenting class were
15 you referring to?

16 A Oh, please, Mr. Ducote. Not a specific
17 parenting class.

18 Q Well, do you put some significance to her
19 answer that -- well, let me back -- let me
20 withdraw that because what you have here in
21 the sentence, "She replied that her
22 counselor and the judge said he should go,
23 but he won't." Where does it say she said
24 yes?

25 A She was agreeing, yes. She was at that

1 point agreeing.

2 Q Where's the agreement? Maybe I'm missing
3 it.

4 A I found out where she said about the Nerf
5 gun, yes. I'm not finding where she said
6 that in my notes, but I know she did. No,
7 I don't even have that in my notes, so that
8 must have been from memory. Oh, yes, I
9 asked her about parenting classes.

10 Q Can you just read what you have written
11 down there?

12 A My notes don't always reflect everything,
13 because all I say is, "Parenting classes?"
14 And she said affirmatively her counselor
15 said he should go and the judge said he
16 should go, but he won't, and he said he
17 could teach himself.

18 Q Okay. Could you just read exactly what you
19 have in your notes?

20 A "Parenting classes? Her counselor said he
21 should and the judge, but he won't. He
22 said he could teach himself."

23 Q Okay.

24 A I didn't complete the sentences, but that's
25 the gist of that.

1 Q Now, did you ask Mr. Arcement, "Hey, you
2 know, Hailey says that you don't want to go
3 to parenting classes because you could
4 teach yourself?" Did you confirm that with
5 him?

6 A No. I confirmed it with the counselor.

7 Q Which counselor?

8 A The counselor's name is Nancy Dietrich.

9 Q You confirmed with her that she said that
10 he should go to the counseling, parenting
11 classes?

12 A No. I asked her -- I had a conversation
13 with her, "Was he willing to have any kind
14 of help? Was he willing to do whatever he
15 could?" And her response to me was that he
16 seemed very willing to take any advice that
17 she offered him.

18 Q Well, did he go to parenting classes?

19 A No.

20 Q Well, then, that wouldn't be accurate,
21 would it?

22 A What wouldn't be accurate?

23 Q Ms. Dietrich said to Mr. Arcement,
24 basically, go to parenting classes?

25 A No. She didn't say she said that.

1 Q Okay. She just said --

2 A Hailey said -- Hailey said that her
3 counselor told him. When I asked the
4 counselor about the sessions, she gave me
5 some information about Mr. Arcement. And
6 that information was that he seemed very
7 willing to do anything he needed to do to
8 improve the relationship between him and
9 his daughter.

10 Q So did you ask Ms. Dietrich, "Did you tell
11 Mr. Arcement to go to parenting classes?"

12 A No, I did not.

13 Q Now, I want to go to page 15 of your report
14 under 4, "Parent/child relationships." You
15 say, "By the time I saw Hailey, she echoed
16 everything that her mother said."

17 A Uh-huh.

18 Q That's your term, "echoed." What do you
19 mean by "echoed"?

20 A She used similar phrasing when she told me
21 about the same events.

22 Q Okay. Now, do you attach significance to
23 that?

24 A It's just an observation.

25 Q Okay. Now, there are two explanations for

1 that, possible explanations, right?

2 A I don't know. You, perhaps, are going to
3 offer those.

4 Q Well, I'm not a psychologist.

5 A You've said that so many times. I have to
6 wonder why you protest so much.

7 Q Because it seems to me that there are two
8 explanations -- and tell me if you agree
9 with that. One is because she experienced
10 and saw what her mother saw, right?

11 A That could be.

12 Q Okay. Now, did you ever ask Hailey,
13 "Hailey, look, you tell me all these things
14 about your father. Did anybody just tell
15 you to say these things? Or are these
16 things that really did happen?"

17 A I did not ask her in those words, no.

18 Q Did you ask her any similar words?

19 A Usually at the beginning I ask them, "Is
20 there anything that either of your parents
21 wanted you to tell me?" That's part of my
22 introduction.

23 Q So you asked Hailey that?

24 A In the beginning I always ask children
25 that.

1 Q What did Hailey say?

2 A She didn't say that there was anything
3 either of her parents told her.

4 Q So when you say "echoed," was it your
5 intention to convey to the Court, look,
6 she's just parroting what her mother says?
7 Is that what you intended to convey?

8 A I intended to convey exactly what I said,
9 which is that she echoed what her mother
10 had said. She specifically talked about
11 the same things that her mother talked
12 about.

13 Q Right.

14 A She made the same complaints that her
15 mother did.

16 Q Okay. Now, so, in your mind, does that
17 mean that Hailey shouldn't be believed
18 because she's saying the same things her
19 mother is saying?

20 A No.

21 Q Well, let me ask it again because it was, I
22 think, maybe poorly asked. Did you want
23 the Court to understand that you were
24 suggesting to the Court that the Court not
25 believe Hailey because she was saying the

1 same things her mother was saying?

2 A No.

3 Q So if somebody said, well, if -- would it
4 be a correct interpretation of that
5 statement that Hailey should not be
6 believed because she's making the same
7 complaints her mother is making?

8 A Asked and answered, but, again, no.

9 THE WITNESS:

10 Aren't you supposed to say asked
11 and answered?

12 MS. McNABB:

13 I'm saving my objections.

14 Q I want to ask you about this: "She at
15 almost 12 is very much caught in the middle
16 of her parents' conflict." What does that
17 mean?

18 A It means that -- I think if you read the
19 next sentence you will see that "because of
20 her loyalty to her mother, she is very much
21 at risk for becoming an alienated child."

22 Q Okay. Now -- and we'll get to alienation,
23 but I want to go to the caught in the
24 middle. What did that mean, she's caught
25 in the middle?

1 A It means that she has feelings for both
2 parents, but she has particular loyalty to
3 her mother and she has very ambivalent
4 feelings about her father.

5 Q Okay. Now, does that mean that what she
6 says her father was doing should not be
7 believed?

8 A No.

9 Q Well, is that -- when you say "loyalty to
10 her mother," what does that mean, "loyalty
11 to her mother"?

12 A Loyalty. It means that she loves and wants
13 to make her mother happy and wants to
14 please her mother and wants to in a sense
15 take her mother's part in what she now
16 perceives as a battle between her parents.

17 Q Well, if, in fact, her father did all these
18 things, what position should she take if
19 she's a healthy child? Should she -- you
20 know -- well, let me ask that first.

21 A Would you mind asking that again?

22 Q Sure. If these things happened to her that
23 she says her father is doing -- let's start
24 there -- then isn't it healthy for her to
25 say, "I don't like these things; I don't

1 feel safe with my father?"

2 A Say one thing at a time, and I can answer
3 one thing at a time. You have too many
4 dependent clauses, Mr. Ducote.

5 Q Let me rephrase it this way --

6 A Thank you.

7 Q -- if a child is in a situation where the
8 mother is not mistreating them and the
9 father is mistreating them, isn't it
10 healthy for the child to ask for the same
11 level of protection as the mother is
12 asking?

13 A Yes.

14 Q So does that mean that there's some
15 nefarious, bad, negative loyalty between
16 the child and the mother because they both
17 don't want to be abused?

18 A I'm sorry, Mr. Ducote. Bad, nefarious?
19 No. Bad, nefarious? No.

20 Q Or negative? Is there anything negative
21 about a child who has seen her mother being
22 abused and has seen her siblings being
23 abused and herself being abused saying, "I
24 don't want to be abused and I'm not real
25 thrilled about the father who abuses me"?

1 A Of course -- a child would not like the
2 things that she is relating to me that her
3 father has done, of course not.

4 Q Right. And the mother doesn't like those
5 things, either, right?

6 A The mother does not like those things
7 either.

8 Q So if both the mother and the child are
9 telling you the same thing, does that mean
10 that there's something unhealthy between
11 the mother and the child?

12 A Not necessarily, no.

13 Q In fact, that's more healthy than not,
14 right?

15 A No.

16 Q It's not?

17 A You're wanting me, Mr. Ducote, to
18 characterize something in a way that you
19 choose to characterize it. That's not how
20 I characterize it.

21 Q Okay. Well, I'm asking you --

22 A No. You're asking --

23 Q -- questions about what you write. That's
24 what I'm asking.

25 A No. You're asking me about conclusions you

1 make from what I write.

2 Q So my interpretation of what you wrote is
3 wrong, correct? That's what you're saying?

4 A Some of your interpretations are wrong.

5 Q Okay. Well, then, I hope they're wrong.

6 A I hope so, too, Mr. Ducote.

7 Q Okay. So when you say "because of loyalty
8 to her mother, she is very much at risk for
9 becoming an alienated child," what loyalty
10 are you referring to other than the fact
11 that she doesn't like the things her
12 father's doing, just like her mother
13 doesn't like the things the father's doing?

14 A This follows not only from my observations,
15 but from my conversation with the
16 counselor.

17 Q Ms. Dietrich?

18 A Uh-huh. Ms. Dietrich was of the mind that
19 this child cannot show her positive
20 feelings for her father because of her
21 loyalty to her mother.

22 Q Well, but --

23 A And, Mr. Ducote, in my observational
24 session with her, she tried not to interact
25 in a friendly, engaging way with her

1 father, but by the end of the time that we
2 were together, she was laughing and smiling
3 and being very positive toward him.

4 Q And you were there, right?

5 A And I was there.

6 Q So she knew that nothing bad was going to
7 happen to her because you're there, right?

8 A She certainly could have come to that
9 conclusion.

10 Q Okay. Isn't it true that the professional
11 literature says that these parent/child
12 observations, whether it's a mental health
13 professional sitting there or in a
14 supervised setting, that you can't -- that
15 kids who are being abused, when they are in
16 those settings, eventually like the
17 opportunity to be able to interact and to
18 have the positive experience because they
19 know nothing bad's going to happen in that
20 setting; isn't that the case?

21 A That's a possibility.

22 Q When you say an alienated child, what are
23 you referring to? Parental alienation
24 syndrome?

25 A Please, Mr. Ducote. I'm referring to

1 becoming an alienated child, which is how
2 the literature at this point in time
3 describes this process. I am not referring
4 to Richard Gardner Syndrome that has been
5 by you and many other people at least
6 disparaged and debunked.

7 Q So you would agree that Richard Gardner's
8 parental alienation syndrome theory is a
9 bunch of nonsense, correct?

10 A I would say that it is not a syndrome. I
11 would say that the behaviors that he
12 describes are behaviors that are observed
13 by many mental professionals and that the
14 latest findings and observations regard
15 this as a continuum upon which a child can
16 either be very much positively allied with
17 a parent to at the other end of the
18 continuum becoming an alienated child. I
19 said she is -- at this point she's
20 estranged from her father. If this
21 continues, she could become an alienated
22 child.

23 Q Now, what is an alienated child, in your
24 opinion?

25 A A child who exhibits a number of symptoms,

1 which include having a very well-scripted
2 and negative opinion about the father that
3 does not necessarily have a base in
4 reality -- that's part of it -- that the
5 child, also, would regard the members of
6 the family and other people that are
7 associated with that parent in negative
8 vein, that the child would idealize the
9 other parent, that the child would have
10 some versions of what had happened that
11 were not logical. And these are among some
12 of the symptoms that a child like that --
13 or characteristics, rather, that a child
14 like that might develop.

15 Q Okay. Now, if I wanted to read some
16 professional psychological literature that
17 would talk about the alienated child and
18 the way that you talked about the alienated
19 child, what should I read?

20 A There is an AFCC conference that addressed
21 that issue specifically, and they published
22 a whole issue of their journal that has to
23 do with parental alienation of the child.
24 And I certainly could give you those
25 references, if you'd like, but I think it

1 was about four or five years ago that whole
2 conference was on that. They published the
3 journal and the article that I'm referring
4 to that describes this.

5 Q By Janet Johnston.

6 A I believe it might have been by Janet
7 Johnston.

8 Q And who else?

9 A I don't remember.

10 Q Do you have that journal?

11 A It may be in my office. I may have loaned
12 it.

13 Q And Janet Johnston and her peers in that
14 article, "Reformulation of" -- that's the
15 title of the article -- "Reformulation of
16 Parental Alienation Syndrome," right?

17 A Uh-huh.

18 Q They caution mental health professionals
19 not to misuse this whole parental
20 alienation concept, right?

21 A And I certainly adhere to that caution.

22 Q And they say that one of the problems that
23 mental health professionals have sometimes
24 is they don't recognize that kids are in
25 abusive situations legitimately don't want

1 much to do with the abusive parent,
2 correct?

3 A They do speak about that, yes.

4 Q And that's not alienation, right?

5 A That's legitimate.

6 Q That's legitimate?

7 A Yes.

8 Q So if, in fact, the things that Hailey says
9 her father is doing are being done by him,
10 then her feelings are legitimate and
11 healthy and we shouldn't try to monkey with
12 them, right?

13 A I was very much interested in that
14 particular perspective, and for that reason
15 I felt that I would talk to her counselor
16 about this whole issue. And her
17 counselor's conclusion was that -- and her
18 words to me were that this child did not
19 have any complaints about her father in the
20 sessions that she had with the counselor --
21 this is what Ms. Dietrich told me -- and
22 that she felt that it was her loyalty to
23 her mother that prevented her from being
24 able to show that she also had positive
25 feelings toward her father.

1 Q Okay. But even kids who are terribly
2 abused also have positive feelings at times
3 about the parent that they love even though
4 they're abusive, right?

5 A That could be, yes.

6 Q Now, we already know that you did not
7 conduct an evaluation to determine if the
8 father had abused the kids. So are you
9 saying that you're simply parroting or
10 echoing what Ms. Dietrich said?

11 A No.

12 Q Okay.

13 A I am saying that, in this case, that this
14 child is caught in the middle between her
15 two parents. This is a child who had no
16 problems with her visitation with her
17 father for a long time. And then if we
18 understand it and look into it, we see that
19 there are things that both parents did that
20 will contribute to her being estranged from
21 her father and more loyal to her mother.

22 Q Okay. Well, if you have a child who's in
23 an abusive situation -- well, let me ask
24 this: Is her mother abusive to her? Did
25 anybody report that?

1 A Nobody has reported that her mother was
2 abusive.

3 Q Now, again, I'm not a psychologist. I know
4 I keep throwing that caveat in there. But
5 if you have a parent who isn't abusive and
6 one who is abusive, maybe it's human nature
7 that the child might be more in tune and
8 more happy with the parent who's not
9 abusing them than the parent who is? Am I
10 wrong about that?

11 A Well, let me answer it this way: When a
12 child is at risk of becoming alienated, you
13 have to look at not only what the parent to
14 whom the child is showing her loyalty does,
15 but you also have to look at what the other
16 parent does, too. And, yes, Mr. Arcement
17 was doing some things, and there were some
18 things that were happening in his household
19 that added to her being estranged from her
20 father at the point that I saw her. Now --

21 Q Okay. Now, did Mr. --

22 A You are interrupting me.

23 Q I'm sorry.

24 A And the things that you have mentioned and
25 you have characterized as abuse are things

1 that is, perhaps, poor parenting -- I'm
2 going to teach you a lesson, shooting her
3 back with the Nerf ball -- poor parenting?
4 I will agree that some of those things,
5 indeed, are poor parenting. If he says,
6 "If you don't make good grades, I'm going
7 to tell on you," That's also poor
8 parenting. I don't know -- Ms. -- I don't
9 want to call you -- Ms. Ratliff did not
10 submit to me any evidence that she had been
11 abused -- no police reports -- therefore,
12 it is her allegation and it is the child
13 basically saying the same sort of thing
14 that her mother said. So I do not know to
15 what extent these things happened or not.
16 And as I caution people in the beginning of
17 a custody evaluation, "If you make an
18 allegation, it just becomes an allegation,
19 unless you have something to substantiate
20 it. If you have something to substantiate
21 it, then it is a substantiated allegation."
22 And this is something I explain to people.

23 Q But the child said she saw it?

24 A Excuse me.

25 Q Hailey said she saw her mother being

1 abused, right?

2 A Hailey said she remembers this, yes.

3 Q And you didn't ask her any more questions?

4 A Yes.

5 Q Is that correct?

6 A Yes. It was exactly what her mother had
7 described.

8 Q But maybe that's because Hailey remembers
9 accurately, right?

10 A It could be. It could be. It could be
11 one; it could be the other, Mr. Ducote.

12 Q But if Hailey --

13 A Excuse me, sir. Did you not just interrupt
14 me?

15 Q I thought you were finished. I'm sorry.

16 A No.

17 Q So but if Hailey had said something
18 different, then you would have said, "Well,
19 Hailey is saying something other than her
20 mother so we can't believe Hailey." And if
21 Hailey says the same thing as her mother,
22 you seem to be implying, "Well, we can't
23 believe Hailey because she's saying the
24 same thing as her mother." Isn't that a
25 damned if she does and damned if she

1 doesn't situation?

2 A No.

3 Q Now, you're aware that there was a big, big
4 effort to put parental alienation in the
5 DSM-V, which is the Diagnostic and
6 Statistical Manual of the American
7 Psychiatric Association?

8 A Thank you for that.

9 Q And that's for the record. I know you know
10 that. But you're aware that there was a
11 big campaign by this Dr. Burnett and
12 Vanderbilt and all these AFCC people to put
13 that in the DSM-V, and that was rejected by
14 the American Psychiatric Association?

15 A Yes.

16 Q Now, in paragraph 10 on page 17, you say,
17 "Although Dawn referenced mental, emotional
18 and physical abuse, she has only Hailey's
19 report to me to substantiate this."

20 A That's correct.

21 Q "Although she took Hailey to a therapist,
22 Hailey revealed nothing abusive to her."

23 A Yes, that's correct.

24 Q Now, did the therapist ask Hailey about
25 this stuff; do you know?

1 A About those specific things? I don't know
2 if she asked specifically.

3 Q You do not know what the therapist asked
4 her?

5 A Not specifically.

6 Q Well, how do you put so much weight on this
7 therapist? Do you know the therapist
8 personally?

9 A Not personally, no.

10 Q And you don't know what the therapist did
11 or didn't do?

12 A This is the therapist that her mother took
13 her to that she went to over a period of
14 time.

15 Q You do not know what she did or didn't do,
16 but you put a lot of weight in whatever
17 came out of it?

18 A I felt that she had the opportunity to talk
19 to Hailey. And this was who her mother
20 brought her to, so I said -- yeah, I did
21 put weight on what she told me.

22 Q How long did you talk to her therapist?

23 A Oh, for about half an hour, 45 minutes.

24 Q Is the therapist a psychologist?

25 A She's a licensed clinical social worker.

1 Q Had you ever talked to her before in your
2 life?

3 A I don't know. I've talked to so many
4 people in my life.

5 Q But I mean --

6 A I don't have her CV, no.

7 Q Hang on. We're getting a little --

8 A Oops.

9 Q We're getting a little enmeshed in our
10 questions and answers.

11 A Oh, please, Mr. Ducote, not that.

12 Q I certainly don't want to alienate you.
13 Now, you say also, "She also made
14 statements that are untrue." What
15 statements did Hailey make that are untrue?

16 A Let me look back and see what she said. I
17 did not believe that it was true that he
18 never spends time with them. I did not
19 believe that he does things that exclude
20 her. I did not believe that he did not
21 play with her. I did not believe those
22 things. That did not seem congruent with
23 what I observed in my observational session
24 with him.

25 Q Well, what you observed may have been

1 different than what happens at home, right?

2 A It could have been.

3 Q In fact, very often many, many cases, you
4 see things that look normal in your office
5 and there's all kind of crazy, bad stuff
6 going on at home, right?

7 A I think a lot can be deduced from the type
8 of specific tasks and observations that I
9 make. I can definitely tell about affect,
10 about responsiveness, about sensitivity.
11 All of those things show up in a play
12 session.

13 Q Now, have you worked with kids who
14 absolutely you're certain have been
15 sexually abused?

16 A Absolutely, I do not work with those
17 children.

18 Q What's that?

19 A I do not work with those children.

20 Q You never work with --

21 A That is not my area, as you well know,
22 Mr. Ducote.

23 Q So you are not an expert in child sexual
24 abuse?

25 A I am not an expert in treatment of child

1 sexual abuse.

2 Q So you've never treated a sexually abused
3 child?

4 A No, I have not. I've treated sexually
5 abused adults.

6 Q And you're not an expert in evaluating kids
7 who are alleged to have been sexually
8 abused?

9 A If I believe that a child has been sexually
10 abused, that child is immediately reported
11 to OCS so that OCS can do the appropriate
12 investigation with their experts.

13 Q Okay. But let me --

14 A I do not do a sexual abuse investigation as
15 part of a custody evaluation.

16 Q Okay. Now, you would agree that the
17 correct protocol, if there are issues of
18 sexual abuse, is for that to be determined
19 before there's a custody evaluation, right?

20 A I would -- in most cases, if there is such
21 an allegation, that allegation is usually
22 made with reports being made available to
23 the evaluator prior. What was unusual
24 about this case is that a lot of these
25 allegations emerged following my issuing

1 the report.

2 Q When you say they emerged --

3 A Well, my report was sent on July 16th --

4 Q Uh-huh.

5 A -- and a protective order was filed on

6 July 25th in which many, many more

7 allegations or many actual allegations of
8 abuse were made.

9 Q Well, in your report on page 2 you say --
10 well, pages 1 and 2, you say, "Issues:
11 Dawn states that Michael's both mentally
12 and physically abusive of the children as
13 he was toward her during the marriage.
14 Examples of physical abuse and various
15 examples of his disciplining the children.
16 She's also concerned that he may be
17 sexually abusing the little girls but has
18 no evidence of this. Michael denies all of
19 these allegations." So these things --

20 A Where were you reading?

21 Q Page 1 and 2 of your report.

22 MS. McNABB:

23 What page?

24 MR. DUCOTE:

25 Page 1 and 2. Not the cover

1 page, but the pages that are numbered
2 1 and 2.

3 A On issues that the parents bring up in the
4 first --

5 MS. McNABB:

6 Page 22?

7 MR. DUCOTE:

8 Page 1 and 2.

9 A She said she is concerned that he may be
10 sexually abusing the little girls, but she
11 has no evidence of this.

12 Q Okay. Now, she has no evidence of that?
13 What does that mean, she has no evidence?
14 Did you ask her, "Why are you concerned?"

15 A Well, of course, I did.

16 Q What did she tell you?

17 A She said that the girls had come back from
18 their dad's house and said that their
19 tootie hurt.

20 Q That was it?

21 A That's essentially what she said.

22 Q She didn't tell you anything else?

23 A I can read and see what else she said. I
24 need to look for a couple of things. All
25 right. So this is when I'm asking Dawn

1 about what had happened with the two of
2 them toward the end of the marriage, what
3 was happening with the children -- it's
4 part of my interview with them -- and bring
5 them up to from what has happened in the
6 past through the early childhood, all the
7 way up to the present. And so she says a
8 lot of the things that she feels that were
9 wrong that he did, a number of them.

10 Q These are during the marriage?

11 A A number of them?

12 Q You're talking about during the marriage?

13 A No. After. Afterwards.

14 Q Okay.

15 A This is after she was not invited to his
16 wedding to Lisa, his girlfriend from high
17 school. Then she's saying she wanted to
18 cooperate and then she got served papers to
19 take away alimony and reduce child support
20 and for custody. And she's -- she
21 mentioned a number of things that happened
22 with the girls. And she said Harmony would
23 want to talk to her father on the phone;
24 he'd refuse to talk. She'd try to call.
25 Dawn would dial. He'd hang up. And he

1 told Dawn to tell the child to tough it up.
2 She wanted to ease the children into that
3 relationship, and he wasn't willing to do
4 that -- the relationship to the stepmother.
5 You want me to read all of this?

6 Q I want you to get to the part about the
7 sexual abuse.

8 A She is not at this point telling me about
9 sexual abuse.

10 Q I want you to get to that point.

11 A When she told me about the sexual abuse was
12 primarily in the first meeting together.

13 Q That's what I'm trying to find out. What
14 exactly did she tell you?

15 A What exactly?

16 Q Uh-huh.

17 A She said, "The children have changed since
18 about a year. At the end of March, the
19 children were little zombies. Looked how I
20 felt. The eldest protected the two
21 younger." She was a stay-at-home mom. She
22 got \$2,900 spousal and child support. And
23 he moved to his grandmas. "The children
24 came alive, but they missed their daddy.
25 Harmony wanted to call her father. He

1 threatened to call the police. Then
2 everything fell into place. This past year
3 Haven has been misbehaving. Her father
4 reports that Haven plays by herself and
5 talks to herself. When it's time to go,
6 she gets oppositional. Hailey would say
7 she does not want to go, but she would go,
8 and then she would refuse to go. The
9 little ones complained that their bottoms
10 hurt." She checked and there was nothing.
11 Then Hailey stopped eating, looked like she
12 was going to pass out. Mom contacted the
13 school to oversee her. Then mom put her in
14 counseling and found out that her father
15 told her she was fat. "He won't let the
16 children call me. Hailey has a cell phone.
17 He takes it from her. Hailey says the
18 little ones ask to come home and it's her
19 fault when they do."

20 Medicine issues: He won't give what
21 the doctor says or she sends. He does not
22 feed them the right things. Haven comes
23 back with diarrhea. He does not inform her
24 or do what she suggests. She is worried
25 how they are taken care of at his house.

1 They are showing extreme problems. She
2 says, "The children have always been with
3 me, and I have never kept them from him.
4 He works, and I'm a stay-at-home mom." She
5 wants all of this cleared up. "I want them
6 to have a father."

7 And then I just had a couple notes
8 about that each of them have another child.
9 Dawn has Emma, who's a year old; and dad
10 has Vincent, who at that time was five
11 months old.

12 Q Okay. So when you say, "She's concerned
13 they he may have been sexually abusing
14 little girls, but she has no evidence of
15 this," is that in those notes you just read
16 me?

17 A I just read that to you.

18 Q So in there she says she's concerned he may
19 be sexually abusing the little girls, but
20 she has no evidence? Did she tell you, "I
21 believe he is sexually abusing them"?

22 A "The little ones complained that their
23 bottoms hurt. She checked and there was
24 nothing."

25 Q Okay. But does she say, "I'm concerned

1 that he's sexually abusing them"?

2 A Not at that point, no.

3 Q At any point does she tell you that?

4 A Not specifically that he was sexually
5 abusing them.

6 Q And did you -- well -- "She has no
7 evidence." Did you ask her -- did you ask
8 her anything about sexual abuse?

9 A Following that?

10 Q Yes.

11 A No. She had the opportunity to tell me
12 about that. She had the opportunity to
13 fill it in in her questionnaire. In other
14 words, we give people the opportunity to
15 say these things. I'm also available if
16 someone -- and I say, "Take my card. You
17 can e-mail me if you need to tell me more
18 information about something."

19 Q Now, did you talk to her husband, Matthew?

20 A Oh, I did talk to Matthew.

21 Q Did he tell you anything about concerns
22 about the kids?

23 A Okay. I did ask her about the tooties.
24 This is what -- the children's name for
25 their vulva is tootie.

1 Q You asked who about that?

2 A I asked the stepmother.

3 Q You asked the stepmother?

4 A But you're asking me about Michael. Let me
5 get to Michael.

6 Q Matthew.

7 A I mean Matthew. I did ask him about the
8 abuse, and he said that -- and I don't know
9 who told us -- he said -- I didn't put --
10 and I don't always put the noun down. He
11 told us that he hurt Harmony's tootie
12 bathing her.

13 Q Do you have a quote from Matthew about what
14 he told you?

15 A We were talking about Hailey at that point.
16 So we'd been talking about Hailey, and then
17 I said question about -- my question mark
18 about what is going on with their father.
19 He said, "He needs counseling. The things
20 he's doing you shouldn't do to your
21 children." And I said, "Like what?" or
22 something to that -- I didn't say who told
23 us. I don't have my noun there -- "that he
24 hurt Harmony's tootie bathing her." So he
25 is saying, I assume, at this point that it

1 was Hailey told us that he hurt Harmony's
2 tootie bathing her.

3 Q Now, you never asked Hailey about that, did
4 you?

5 A No, I did not ask Hailey about the tooties,
6 no.

7 Q Did you call up Ms. Ratliff after your
8 conversation with Matthew and discuss that
9 with her; do you remember?

10 A No, I did not. I didn't call her after
11 that, no.

12 Q Are you sure? Didn't you have a phone
13 conversation with Ms. Ratliff after that in
14 response to that conversation with Matthew
15 to ask her more about the tootie situation?

16 A I may have. I don't recall.

17 Q You don't have any notes about that?

18 A No. It's entirely possible that I did.

19 Q Now, just to be clear, your Ph.D. is in
20 sociology, correct?

21 A Yes.

22 Q And that's not a clinical --

23 A No.

24 Q -- degree, correct?

25 A No.

1 Q And the Ph.D. in sociology does not entitle
2 you to do any sort of evaluation or
3 licensure in any kind of psychology or any
4 sort of evaluative process, correct?

5 A That's correct.

6 Q That's an academic degree?

7 A That's an academic degree.

8 Q And your highest clinical degree is the
9 master's in social work?

10 A That's correct.

11 Q Hang on. Just a little bit of pause, if
12 you would, please. And so your license is
13 not as a psychologist, but as a clinical
14 social worker, right?

15 A That's correct.

16 Q Now, when you say in paragraph 10 of page
17 17, "Once a child" -- sorry -- "It is her
18 mother's animosity toward her father and
19 her loyalty to her mother that has led to
20 her refusal to visit with the father,"
21 where do you get that from?

22 A That's a conclusion that I'm coming to
23 based on my conversation with her
24 therapist, my interview with all of the
25 people, including mom, stepmother, stepdad,

1 everybody. That's one of my conclusions
2 that I'm drawing from the information that
3 I collect.

4 Q So but what -- did anybody tell you that
5 was the case?

6 A What are you referring to?

7 Q Did anybody --

8 A Which page?

9 Q What data says -- what is the data that
10 says that this comes from her mother's
11 animosity and not the fact that her father
12 does all the things that Hailey says he
13 does? Where does that come from other than
14 the alienation frame of mind?

15 A What are you referring to?

16 Q Page 17 of your report, paragraph 10. "It
17 is her mother's animosity toward her father
18 and her loyalty to her mother that has led
19 to her refusal to visit her father." Where
20 do you get that from?

21 A And I just told you. So I'll tell you
22 again. It comes from my interviews with
23 all of the parents, my observations of the
24 children, my discussion of the case with
25 the therapist. All of the information that

1 I gathered led me to that conclusion.

2 Q But isn't that the circular criticism of
3 the mental health professionals who buy
4 into the alienation paradigm that -- the
5 alienation -- that a child doesn't want to
6 visit with the father, therefore it's the
7 mother's fault for the child being
8 alienated regardless of the fact that the
9 child is reporting things that would cause
10 her not to want to visit with the father?
11 I mean, isn't that the circular criticism
12 of the alienation nonsense?

13 A That's your criticism.

14 Q Me and a bunch of other people?

15 A So you say.

16 Q You're familiar with all the literature
17 that says that, are you not?

18 A I'm familiar with a lot of the literature.

19 Q That says that correct?

20 A I am familiar with the literature.

21 Q Okay. Doesn't the literature say basically
22 what I just said?

23 A It says a version of what you said.

24 Q Okay. Now, when you say, "The remedy is
25 never less time with the alienated parent;

1 rather, more time gives the child the
2 opportunity to have a realistic view of her
3 parent, not what the alienating parent is
4 communicating," now, doesn't that presume
5 that what Hailey says her father's doing is
6 false?

7 A A lot of what her father may have been
8 doing, the things that more than one person
9 corroborated, other than just Hailey saying
10 what her mother said and her mother saying
11 what Hailey said. For instance, the
12 instance of the phone being taken away,
13 that's something that Hailey talked about;
14 that's something that the stepmother talked
15 about. This is something that Hailey
16 didn't like, that she didn't have access to
17 her phone. She felt that her father wasn't
18 letting her have the phone. This was one
19 of the things that Hailey complained about.
20 You haven't brought that up, but I'm
21 mentioning it. Certainly there were a
22 number of things that dad did that was
23 corroborated by various people, including
24 the stepmother, Hailey, her mother, all
25 spoke about the phone issue. And this is

1 something that the child did not like, took
2 exception to. She felt bad about it. She
3 wanted to be able to call her mother all
4 the time. This is something that could
5 have been handled better. Okay? But what
6 was happening in this case is that she
7 never got a chance really to be around --
8 after she stopped going, she didn't get a
9 chance for any of these things to be
10 remedied. None of these things were
11 remedied. What the father said in his
12 conversations with the therapist, that he
13 was willing to do whatever was necessary to
14 remedy the situation in which she felt
15 estranged from him.

16 Q Well, the phone thing, but you would admit
17 that the phone thing is not as big a deal
18 as seeing her mother choked, by him sitting
19 on her, by him telling her that the ravens
20 are going to pick out her eyes, telling her
21 her mother's going to go to jail, all those
22 sorts of things? I mean the phone isn't a
23 big deal in light of that?

24 A There were a whole number of factors that
25 you haven't mentioned. The fact that she

1 was no longer the only child in her
2 father's household -- she wasn't the oldest
3 child anymore. The things that mom
4 told of, that she was not introduced to the
5 situation with stepmom in a gradual manner.
6 There were a lot of things that might have
7 been handled differently, including things
8 like the phone or how you correct a child
9 or whether you make threats to the child
10 about her grades. All of these things
11 could have been handled differently.
12 Granting that the child up to that time had
13 had a very positive relationship with her
14 father, had been, in a sense, her father's
15 favorite, and dad remarries and she's no
16 longer the apple of his eye and she has to
17 conform to the expectations of another
18 household. All of those factors come into
19 play.

20 Q But that happens when people get remarried?

21 A It does happen.

22 Q But in every family you don't have people
23 drinking, calling the 12-year-old a bitch,
24 calling their mother a bitch, choking their
25 mother, sitting on them, threatening them,

1 telling them the ravens are going to pick
2 their eyes out? I mean, see -- okay. Let
3 me go back to page 17 where you say, "The
4 remedy is never less time with the
5 alienated parent, rather more time gives
6 the child the opportunity to have a
7 realistic view of her parent, not what the
8 alienating parent is communicating. In
9 other words, the children need more time
10 with the father to mitigate the effects of
11 Dawn's efforts to alienate them." That's
12 right out of Richard Gardner, isn't it?

13 A No.

14 Q Well, who else writes that? If I wanted to
15 go and read, tell me some place in the
16 professional literature, other than the
17 Richard Gardner debunked remedies, that
18 says what you say there?

19 A That same article that you mentioned by
20 Janet Johnston.

21 Q That's where it is?

22 A Uh-huh. It's there. It's in a number of
23 those articles that say how do you treat,
24 how do you work with a child that has been
25 alienated.

1 Q Okay. But that also distinguishes the case
2 where the child doesn't want to be with the
3 parent because of the parent's behavior, so
4 that's what --

5 A She would not be going in that direction
6 if -- and this is one of the things that
7 I'll admit that I notice is not made
8 sufficiently in the literature, that it
9 takes two parents for a child to become
10 alienated --

11 Q Okay. So --

12 A -- one parent to be doing things that are
13 disturbing to the child, and the other
14 parent to take complete advantage of that
15 and use that to move the child farther away
16 from the father.

17 Q So if a parent is abusing the child, the
18 other person is at fault for saying,
19 well --

20 A Mr. Gardner (sic.), you're characterizing
21 all of this as she -- you're taking, of
22 course, your client's word that this child
23 was being abused.

24 Q What, you're saying she wasn't?

25 A You're mentioning that she has a memory of

1 her mother being abused by her father, and
2 that's abuse --

3 Q Well, isn't that --

4 A -- that he threatened her about her grades.
5 You are compiling a lot of things which
6 were probably not good parenting on his
7 part -- disciplining by showing a child how
8 it felt to be knocked over, probably not
9 the best way -- but you're calling this
10 whole thing that the child is being abused
11 by the father.

12 Q So the mother should say, "Well, you know,
13 your father does all these things, but he's
14 a great guy, anyway, and don't worry about
15 it"?

16 A No. She should say, "You and your daddy
17 need to go to therapy together."

18 Q Really? Didn't you send -- did you get
19 anything in writing from Nancy Dietrich?

20 A Yes. I got the permission slip.

21 Q But did Nancy Dietrich send you anything in
22 writing?

23 A You mean did she send me a report? No, she
24 did not.

25 Q Do you know what advice Nancy Dietrich gave

1 to Dawn about Hailey's visitation with her
2 father?

3 A No, I don't.

4 Q Are you assuming that Nancy Dietrich did
5 not tell -- or told Dawn that she should
6 encourage Hailey to visit with her father?

7 A I don't know if she told her that or not.

8 Q You put a lot of weight on Nancy Dietrich,
9 but you're not sure about the details,
10 basically?

11 A I put a lot of weight on our conversation.
12 I'm not putting weight on things that did
13 not happen.

14 Q Okay. Well, we'll find out. Now, are you
15 familiar with the Louisiana Post-Separation
16 Family Violence Relief Act?

17 A Yes.

18 Q Because you just mentioned article 134?

19 A Yes.

20 Q So you agree that if -- that a parent who
21 is abusing a child should only have
22 supervised visitation and no custody,
23 right?

24 A Yes.

25 Q You agree with that?

1 A Yes.

2 Q Did you do any sort of evaluation to
3 determine if Mr. Arcement had physically or
4 emotionally abused any of the children? I
5 had asked you about whether you evaluated
6 to determine if he had sexually abused the
7 children. I'm asking you, did you do any
8 sort of evaluation to determine if
9 Mr. Arcement had either physically or
10 emotionally abused the children?

11 A I did an individual interview with Hailey.
12 I did not interview the two younger
13 children individually.

14 Q Okay. Well, let me ask you again. Did you
15 do any sort of evaluation to determine if
16 Mr. Arcement had physically or emotionally
17 abused Hailey?

18 A Beyond my interview with her, no.

19 Q Okay. I think I'm just about finished.

20 At the time you talked to Ms.
21 Dietrich, do you know how many times Ms.
22 Dietrich had talked to Hailey or met with
23 Hailey?

24 A She told me. She said that mom brought
25 Hailey a few times, but Hailey did not

1 speak specifically to her. The last time
2 she saw her was on April 25th. So she
3 did not say -- she didn't have her notes in
4 front of her.

5 Q I don't have any other questions. Counsel
6 may have some questions for you.

7 EXAMINATION BY MS. McNABB:

8 Q I just have a couple. I don't know if I
9 heard your answer correctly when Mr. Ducote
10 asked you if you treated child victims of
11 sexual abuse.

12 A My answer is, no, I do not.

13 Q You do not? Okay.

14 A I refer them.

15 Q Do you have any experience with or have you
16 worked on any cases that have involved
17 similar allegations, but where the mother
18 has taken the children to be interviewed or
19 examined or evaluated by eight or nine
20 different mental health professionals and
21 physicians?

22 A Not by eight or nine, no.

23 Q Are you familiar with the disorder called
24 Munchausen by proxy?

25 A Somewhat, yes.

1 Q So what is your understanding of what that
2 disorder is?

3 MR. DUCOTE:

4 I'm going to object. I don't
5 think she has the expertise to
6 diagnose it, and that it's even a
7 legitimate diagnosis.

8 MS. McNABB:

9 I'm asking her what her
10 understanding of the disorder is.

11 MR. DUCOTE:

12 Right. But that assumes that
13 there is such a disorder. And there's
14 nothing in the DSM-IV or V about
15 Munchausen.

16 A It is a pattern of behavior in which a
17 child becomes ill and manifests symptoms of
18 an illness, but it is actually instigated
19 by the mother or the father.

20 Q And have you gotten any professional
21 education by way of seminars or classes or
22 lectures or whatever regarding Munchausen
23 by proxy --

24 A No.

25 Q -- involving allegations of sexual abuse?

1 A No.

2 Q Okay. I have no further questions. Thank
3 you.

4 MR. DUCOTE:

5 I don't have anything else.

6 You have the right to read and
7 sign or you can waive that. That's up
8 to you.

9 THE WITNESS:

10 I would like to read and sign the
11 transcript.

12 MR. DUCOTE:

13 Can we expedite by Friday?

14 I don't have a problem if you
15 e-mail it to her and she reads it and
16 signs and sends it back by fax or some
17 other means and mails her signature
18 page.

19 THE WITNESS:

20 Or if it's acceptable, I could
21 just say, "Please make the following
22 corrections; other than that, it's
23 okay."

24 MR. DUCOTE:

25 Well, there's a sheet that comes

1 with it that you can use. I don't
2 think you can change the substance of
3 your answer. I think you can make
4 corrections. You can -- people do
5 different things and then everybody
6 argues about the significance of
7 things people do at the end, but
8 whatever --

9 THE WITNESS:

10 I rarely take exception to
11 anything, unless there's a gross
12 misspelling or misrepresentation of
13 what I said.

14 MR. DUCOTE:

15 Okay. Anything else?

16 MS. McNABB:

17 That's all. No.

18 MR. DUCOTE:

19 That concludes the deposition.
20 Thank you very much.

21 THE WITNESS:

22 You are very welcome.

23 --DEPOSITION CONCLUDED AT 4:44 p.m.--
24
25

C E R T I F I C A T E

I, MELISSA M. EVANS, Certified Court Reporter in and for the State of Louisiana, as the officer before whom this testimony was taken, do hereby certify that DR. KAREN VAN BEYER, to whom oath was administered, after having been first duly sworn by me upon authority of R.S. 37:2554, did testify as hereinbefore set forth in the foregoing 87 pages;

That this testimony was reported by me in the stenotype reporting method, was prepared and transcribed by me or under my personal supervision, and is a true and correct transcript to the best of my ability and understanding;

That I am not related to counsel or the parties herein, nor am I otherwise interested in the outcome of this matter.

Melissa M. Evans
Certified Court Reporter #89007

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