

**PREPARING FOR  
CHILD CUSTODY CASES**

# WATCHTOWER

BIBLE AND TRACT SOCIETY OF NEW YORK, INC.

CABLE WATCHTOWER

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Dear

Re: Child Custody Materials

We have received your request for the packet of court decisions and other materials on child custody. It is always saddening to learn of problems involving child custody, but we are delighted to see that you are continuing to seek Jehovah's guidance and protection in all matters and taking advantage of this situation to bring further praise to him. (Luke 18:1-8) We urge you to present this information to your attorney as soon as possible. If allegations are made that your religious beliefs and practices are harmful to your children, the enclosed information may prove helpful.

We particularly draw your attention to the booklet entitled Preparing For Child Custody Cases. The questions and other information in this booklet should help you and your attorney understand the nature of the attack that may be made against a parent who is one of Jehovah's Witnesses. In addition, the material in this booklet should help you and your attorney prepare for not only court hearings but also psychological assessments or evaluations that often are required as part of a custody determination. It is our experience that the results of such psychological examinations can be decisive in the court's award of custody. Thus it is good to appreciate the purpose and importance of the psychological examination and to present your beliefs as one of Jehovah's Witnesses in a way that will benefit yourself and your children. —Isaiah 48:17.

It may be advantageous to ask your attorney to present to the court certain publications of the Society which may be used to demonstrate that your religious beliefs are far from harmful but rather are highly beneficial to your children. Depending on the ages of your children, you should consider showing one or more of the following publications to your attorney: My Book of Bible Stories; Listening to the Great Teacher; School and Jehovah's Witnesses (brochure); Your Youth—Getting the Best Out of It;

Re: Child Custody Materials

Page 2

Making Your Family Life Happy. Also, for adolescents, articles from the "Young People Ask . . ." series in the Awake! magazine present helpful information on a wide variety of subjects. Check the listing of "Young People Ask . . ." articles in the Watchtower Publications Index 1930-1985, pages 953-954. The index of subsequent bound volumes of Awake! can be checked to cover more recent articles in the series.

You can explain to your attorney that these publications and articles contain excellent Bible-based counsel and practical wisdom which will help your children develop into healthy, happy, productive individuals. Rather than containing matter that is harmful, these publications and articles provide highly beneficial information. Indeed, much of the information is nondoctrinal and of universal appeal.

Along this line, it may be helpful to show the court that a parent who is one of Jehovah's Witnesses will have greater concern for his children because of the Scriptural responsibilities imposed upon parents. We have found it practical to present the court with a copy of one or more of the Society's publications mentioned above. Many judges are willing to review these publications because of the contents and because of the excellent illustrations which serve as effective teaching aids. You may also want to point out to your attorney how many copies of these publications have been printed as indicated in the opening pages of the publications. Since many of them have been distributed in the tens of millions of copies, the fact that there are only three million Jehovah's Witnesses in the world attests to the widespread appeal of these publications.

We also recommend that you give your attorney copies of Jehovah's Witnesses--Unitedly Doing God's Will Worldwide and Jehovah's Witnesses in the Twentieth Century. These two brochures will better acquaint your attorney (and the court, if necessary) with the practices, history, and beliefs of Jehovah's Witnesses.

Your brothers and fellow servants,

*Watchtower B. V. Society*  
OF NEW YORK, INC.

Enclosures

P.S. Thank you for your kind contribution.

# TABLE OF CONTENTS

	PAGE
INTRODUCTION	
SAMPLE CROSS-EXAMINATION QUESTIONS THAT <i>WITNESS PARENT</i> COULD FACE . . . . .	1
SAMPLE APPROACH BY <i>WITNESS PARENT</i> TO CROSS-EXAMINATION . . . . .	11
SAMPLE CROSS-EXAMINATION QUESTIONS FOR <i>NON-WITNESS PARENT</i> . . . . .	14
SAMPLE DIRECT EXAMINATION AND SAMPLE RESPONSES FOR <i>LOCAL ELDER</i> . . . . .	26
SAMPLE RÉSUMÉ OF <i>BIBLE STORY BOOK</i> . . . . .	34
SAMPLE DIRECT EXAMINATION AND SAMPLE RESPONSES FOR <i>YOUNG WITNESSES</i> . . . . .	40
LIST OF SOURCE MATERIAL— <i>Professional Studies in Child Psychology</i> . . . . .	45
PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION . . . . .	52

It is a well-known fact that the first step in the process of creating a new product is to identify a market need. This process often involves extensive research and development, and is a critical factor in the success of a company. The second step is to develop a prototype of the product, which allows the company to test the product and gather feedback from potential customers. The third step is to create a marketing plan, which outlines the company's strategy for reaching its target market. The fourth step is to launch the product and monitor its performance in the market. The fifth and final step is to evaluate the product and make any necessary adjustments to improve it. This process is iterative and can take a significant amount of time and resources. However, it is essential for a company to follow these steps in order to create a successful product that meets the needs of its target market.

## INTRODUCTION

This booklet is designed to help you and your attorney prepare for the difficulties Christian parents often face in child custody disputes. In the eyes of the law, the overriding concern in every custody suit is the welfare and best interests of the child. In deciding which parent will better provide for a child's best interests, courts will examine all aspects of the child's physical, emotional, and spiritual welfare in either household. Thus your religious practices and teachings as one of Jehovah's Witnesses will probably be a subject of inquiry by your former spouse and the court.

Opposers often focus attention on refusal to consent to blood transfusions, holidays and birthday celebrations, arguing that Witness children are deprived of a "normal" upbringing. There is no need to hide or distort your religious beliefs and practices in the face of such criticism. When giving an answer, always try to focus on the positive aspects of your religious beliefs, showing how they have benefited you and your family. (Isa. 48:17) Be sure to answer questions regarding such subjects in a way that is both understandable and reasonable, accurately presenting the wholesomeness of the Christian home.—1 Pet. 3:15.

This booklet will also help you prepare for psychological examinations that frequently are required as part of a child custody determination. Having some idea of the type of questions a psychologist may ask should help you handle the examination naturally and without undue anxiety.

Disputes over child custody can be an ordeal for Christian parents. But with preparation and reliance on Jehovah, you need not be without hope, knowing that in the end Jehovah will set all matters straight.—Ps. 43:1; 1 Pet. 3:12.



**SAMPLE CROSS-EXAMINATION  
QUESTIONS THAT *WITNESS*  
*PARENT* COULD FACE**



### ***Holidays:***

When answering questions about holidays, we want to remember that many people view our religion as a litany of negative responses. Therefore, whenever possible, add some positive statement which emphasizes the benefit to ourselves and our children when we refrain from a celebration or holiday. For example, rather than simply saying, "No, I don't celebrate Christmas," you may respond in the affirmative, "After a careful investigation of the Scriptures and the historical background of Christmas, my family and I concluded that the celebration of Christmas was not necessary to have God's approval. We have decided not to limit our gift-giving and family gatherings to specific predetermined dates, but would rather enjoy these activities year round."

On the subject of holidays you may face questions such as the following:

- Do Jehovah's Witnesses celebrate Christmas? Thanksgiving? Easter? Birthdays? Halloween? Mother's Day? Father's Day? Valentine's Day? New Year's Day? St. Patrick's Day? Why?
- Are not your children deprived of the Christmas spirit?
- Most of the children in your child's class celebrate Christmas . . . , etc.?
- Is it difficult for children to feel different than their classmates and school friends?
- So is it difficult for children to be Jehovah's Witnesses?
- In fact, is it difficult for you at times to feel different and to be one of Jehovah's Witnesses?

### ***Religion:***

Many try to portray the beliefs and practices of Jehovah's Witnesses as dogmatic and restrictive. When answering questions about your religious beliefs and practices, emphasize the fact that you have formed your beliefs and adopted your practices after much study and reflection; your religion is not simply a matter of rules

**CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE**

which have been imposed by the elders. You want to emphasize the fact that you are a thinking, well-balanced, and reasonable individual who is competent to act as a parent. Avoid any response which gives the impression that you are unwilling or unable to provide for your child's best interests because of your religious beliefs.

On the subject of religion you may face questions such as the following:

- Do you believe you have the only right religion?
- Do you believe the Catholic (or other) Church is true or false?
- Do you believe all false religion is under the control of Satan?
- Is the Catholic (or other) Church under the control of Satan?
- Are Catholics (or whoever) under the control of Satan?
- How do you feel about your ex-wife/husband who is not one of Jehovah's Witnesses?
- Is he/she under the control of Satan?
- What do you teach your child about your ex-wife/husband?
- Will God destroy all false religion?
- As one of Jehovah's Witnesses, do you believe that only Jehovah's Witnesses will be saved?
- Will all Catholics (or whoever) be destroyed?
- Will you teach your child that his father's/mother's religious beliefs are wrong?
- Will you teach your child that his father/mother will be destroyed by God if he/she does not become one of Jehovah's Witnesses?
- Will you teach your child that there is a risk that his father/mother will be destroyed by God?
- Is it true that there are great differences between

**CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE**

beliefs of Catholics (or whoever) and Jehovah's Witnesses?

- In fact, you left the Catholic (or other) Church to become one of Jehovah's Witnesses?
- Can you be one of Jehovah's Witnesses and a Catholic (or whatever) at the same time?
- If you cannot be one of Jehovah's Witnesses and a Catholic (or whatever) at the same time, how can you expect your child to be?
- Will you teach your child that both your church and the Catholic (or other) Church are right?
- Won't your child be confused by being taught two religions?
- If your son was participating in a play or another special event at the Catholic (or other) Church, would you attend?
- Do you respect all religions?
- If a member of your family was being baptized, married, or a family funeral service was being given in the Catholic (or other) Church, would you attend?
- How is this showing respect for the Catholic (or other) Church or your family?
- If you respect all religions, why do you go from house-to-house trying to convert people?
- How would you feel if your child decided he did not want to be one of Jehovah's Witnesses and chose to belong to another church?
- Would you still love your child?
- Do you teach your child only about the religion of Jehovah's Witnesses?
- Do you believe that your child should learn about other religions?
- If your child, out of curiosity, decided he wanted to attend the services of another church, would you allow him to? Would you accompany him?

**Blood:**

Some confuse our stand on the use of blood and blood products with the position of religions that believe in faith healing and refuse all medical treatment. You want to show that you are a loving, caring parent who wants the best medical care possible for your child. Explain that you are aware of many serious and possibly fatal dangers from blood and that you have made arrangements with your doctor to provide alternative non-blood management for your child. Acknowledge that your former mate properly has a right to participate and have a say in any medical decisions involving your child. Stress the fact that you want the best available medical treatment for yourself and your child and that avoidance of blood, in your opinion and the opinion of many in the medical community, is a sound, healthful course.

- Do you believe that every word of the Bible is literally true?
- Do you teach that it is better to die than to take a blood transfusion?
- You claim that there are alternatives; what is the alternative where someone loses blood in a car accident?
- How do you know there are alternatives?
- Is it true that only a minority of doctors are willing to try alternative, bloodless treatment?
- Do most doctors recommend blood transfusions?
- Isn't it true that it may not be possible to find a doctor who will use bloodless alternatives? What if the only available doctor said there were no alternatives? Would you prefer to die?
- Would you ever consent to your child being given a blood transfusion?
- What if the doctors said your child would die without a blood transfusion?
- If the doctors told you that your child needed a blood transfusion, would you advise and consult your ex-wife/husband?

## CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE

- How would you feel if your ex-wife/husband consented to your child being given a blood transfusion?
- Would you suffer any religious penalty if you or your child were given a blood transfusion?
- Would you be subject to alienation or disapproval from church members if you or your child were given a blood transfusion?
- Would you still love your child, even if he/she was given a blood transfusion?

### ***Governments:***

The stand which Jehovah's Witnesses take regarding governments is often misunderstood. When responding to questions regarding your view of government, accentuate the positive—you pay all your taxes, you are honest and law abiding, you do not involve yourself in civil disobedience, and you believe that the superior authorities, including court officials, should be obeyed and are worthy of our honor and respect.

- Do you believe the governments of this world are controlled by Satan?
- Are the judge and this court controlled by Satan?
- Do you believe God will destroy the governments of this world?
- Do you vote?
- Do you stand up for the National Anthem/salute the flag?
- If your country is at war, would you fight in the military?
- Do you believe that you will be persecuted for your beliefs?
- What kind of persecution do you expect and from whom?
- Do you teach your child that he will be persecuted for his beliefs? Is that healthy for your child?

## CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE

- Is your child frightened by the prospect of persecution?

### ***Satan:***

Many do not consider Satan to be a real person and will find your belief in Satan to be childish or fanatical. When giving an answer, distinguish the Bible's view of Satan from the cartoon character with a pitchfork, as many people view Satan. If people believe in God and His angels, why is it childish to believe that some angels chose to disobey God?

- Is Satan the ruler of the world?
- Does Satan control everyone who is not one of Jehovah's Witnesses?
- Is Satan powerful?
- Are you afraid of Satan?
- Do you teach your child about Satan? Is your child afraid of Satan?

### ***Armageddon:***

Armageddon marks a time of destruction of the wicked, as well as the beginning of Jehovah's righteous new system. Emphasize the positive aspects of the event. It is not like the frightening hellfire doctrine, which keeps the wicked in torment forever.

- Do you believe that we are living in the time of the end? Do you believe that many people and much of the world will be destroyed at Armageddon?
- Will that be a frightening time?
- Do you teach your child about Armageddon?
- Is your child not scared/upset at the prospect of his mother/father, school friends, neighbors and himself/herself being destroyed at Armageddon?

### ***Practices of Jehovah's Witnesses:***

- How many meetings do Jehovah's Witnesses have a week?

## **CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE**

- Do you attend all of these meetings?
- If you did not attend all of these meetings or go out preaching, would you be subject to congregational disapproval or discipline by your elders?
- Do you bring your child to all of these meetings?
- Is it not correct that if your child attends your mid-week meeting he would not be in bed before 9:45 or 10:00 p.m.? Is that not a very late night for a small child?
- Isn't it difficult for a small child to sit through these long meetings? Wouldn't your child rather be playing than attending these church meetings?
- Would you teach your child to be one of Jehovah's Witnesses?
- Do you hope your child will become one of Jehovah's Witnesses?
- Will you bring your child to all of your meetings?
- Will you bring your child out in your preaching work? Every weekend? For how long?
- If your child did not want to go to your church meetings, would you force him to go?
- If your child did not want to go out preaching, would you force him to go?
- Is it not difficult for you to go preaching at times? Do you meet some people who do not want to hear your message, who reject you and are rude to you?
- If your child went preaching he at times would encounter people who disagree with him, reject him and are rude to him?
- Wouldn't that be difficult for your child? Would he find that hard to endure?
- Is it not harmful for children to feel rejected?
- If you care about your child, why would you deliberately place him in a situation where he is bound to suffer embarrassment and rejection?

**School: (May be faced with quotes from  
"School" Brochure)**

Many feel that Jehovah's Witnesses are against education. On the contrary, the children of Jehovah's Witnesses are encouraged to make the most of their education and to become proficient in reading, writing, and analytical abilities. In fact, Jehovah's Witnesses often excel in school. You may use the *Index* to investigate the wide range of topics on which the Society encourages discussion and research. The Society's publications encourage our youths to be diligent and serious-minded in their studies.

- This booklet "School and Jehovah's Witnesses" sets out your church's beliefs in the school setting? Your church recommends that parents and children in your faith are to follow the rules set out in this booklet and that teachers should abide by them?
- Isn't it true that you won't permit your child to associate with or make close friends of people who are not Jehovah's Witnesses?
- Isn't it true that you won't permit your child to go to school dances? to date?
- Isn't it true that you would not allow your children to participate in extracurricular activities? school plays? school bands?
- Isn't it true that you would not permit your child to be a class representative or be on the school council?
- Isn't it true that you would not permit your child to participate in school elections?
- Isn't it true that you would not allow your child to join any school clubs?
- Isn't it true that you would not allow your child to join any school teams?
- Isn't it true you would not permit your child to engage in any school activities associated with national or religious holidays?
- You do not permit your child to stand up for the National Anthem in school?



## CROSS-EXAMINATION QUESTIONS THAT *WITNESS PARENT* COULD FACE

- Your children will be very different from the majority of children in school and will be deprived of many enjoyable, healthy activities that other students enjoy?
- At times your child may be mocked or alienated at school because of these beliefs?
- It's not easy for a child to be one of Jehovah's Witnesses at school?
- If you love your child why would you want to deprive him/her of so many activities that he/she would enjoy?
- Isn't it true that you would not permit your child to attend a college or university?
- Isn't it true that if your child attended a college or university he/she would face disapproval in congregation and be subject to counseling by your ministers?
- Would you support your child if he/she decided to go to a college or university?
- Isn't it true that you want and are going to teach your child to be a full-time minister?
- That is the only career that you intend for your child?

### ***Corporal punishment:***

- As one of Jehovah's Witnesses you believe in corporal punishment?
- You believe the Bible directs parents to discipline their children with a rod or stick?
- You would not be a good Christian/good parent if you failed to heed that Biblical command?

### ***Practice sessions:***

- Did you talk to your lawyer about this court proceeding?
- Did your lawyer tell you what to say?

**SAMPLE APPROACH BY  
*WITNESS PARENT*  
TO CROSS-EXAMINATION**

*Do you believe you have the only right religion?*

Of course I do. If I didn't think so I would join another.

*Do you believe the Catholic (or other) Church is true or false?*

I believe its teachings are in error.

*Will all Catholics (or others) be destroyed?*

Jehovah makes those judgments, not we.

*Do Jehovah's Witnesses celebrate Christmas?*

The celebration of the winter solstice on December 25 goes back to the ancient Roman practices of the Saturnalia. It is part of pagan sun worship. We do not celebrate pagan festivals. The Bible directs that we celebrate Jesus' death, not birth.

*Are not your children deprived of the Christmas spirit?*

Jehovah's Witnesses encourage love, familial association and charity throughout the year. Gift-giving and family association are not restricted to one day or time of year.

*Do you respect other religions? If so, why do you go from house to house trying to convert people?*

The Bible has good news for people of all religions and backgrounds—the good news that God will soon bring peace to earth through his Kingdom. We want to share this with our neighbors.

**SAMPLE APPROACH BY WITNESS PARENT TO CROSS-EXAMINATION**

*Do you teach that it is better to die than take a blood transfusion?*

I do not want myself or my children to die. I want the best medical treatment I can get for my child. Blood transfusions carry many death-dealing side effects such as AIDS. We prefer to accept safer medical alternatives.

*How do you know there are alternatives?*

Our church regularly reproduces medical information that points out alternatives. Besides, I have discussed this with my doctor who is willing to use the alternatives.

*What if a doctor said there are no alternatives?*

That is only one opinion. Jehovah's Witnesses know from experience that there are many different medical opinions. Also we know of many cases where the same thing was said but the patient still recovered without blood transfusion. Jehovah's Witnesses are being treated successfully without blood by doctors and hospitals throughout North America.

**SAMPLE CROSS-EXAMINATION  
QUESTIONS FOR  
*NON-WITNESS PARENT***

***Work:***

- Where do you work?
- How far is your work place from your home?
- What time do you leave for work?
- What are your hours of work?
- What times would the child require day-care assistance of a neighbor? friend? relative?
- Is your spouse home at those same times?
- Is a neighbor/friend/relative to be preferred over the child's mother/father for day-care?

***Jehovah's Witnesses' role as parents and spouse . . .***

**A) Parent:**

- Does your spouse prepare meals for the family?
- Does your spouse do family laundry?
- Does your spouse care well for the home? (i.e., provide a neat home, do maintenance, etc.)
- Does your spouse care well for the children?
- Does your spouse wake the children in the morning?
- Does your spouse dress the children in the morning?
- Does your spouse prepare breakfast for the children?
- Does your spouse prepare lunch for the children?
- Does your spouse prepare supper for the children?
- Does your spouse take the children to school?
- Does your spouse take care of the children when they are sick?
- Is your spouse at home when the children return from school?

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- Does your spouse put the children to bed?
- Does your spouse take an interest in the children's education?
- Does your spouse spend time helping the children with their education/homework in school?
- Does your spouse visit the schoolteachers?
- Does your spouse attend the school on parent/teacher night?
- Do you attend the school on parent/teacher nights?
- When was the last time you attended the school on parent/teacher night?
- Does your spouse engage in recreation with your children? Which? When?
- Do your children love your spouse?
- Does your spouse love your children?
- Wouldn't you agree that your children need both their mother and their father?
- Is your spouse a good parent?
- Would you describe your spouse as a good man/woman?
- Describe your spouse's good qualities.

***If non-Witness alleges Witness spouse has made church more important than family:***

- How has your spouse put his/her church ahead of family? Give examples.
- What you really mean is she will not let you dictate what church she goes to?

**B) Spouse:**

- How did spouse's conversion to Jehovah's Witnesses harm his/her sexual relationship with you?
- Did your spouse refuse the marital due?

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- Have you been very upset since your spouse has become one of Jehovah's Witnesses?
- Might your angry attitude have an adverse emotional effect on your spouse?
- Is it surprising your spouse would find it difficult in view of your attitude of intolerance and animosity?
- Is your spouse hospitable?
- Does your spouse entertain your friends and family?
- Isn't it true that your spouse is friendly and has good relationships with your family members?
- Did your spouse suggest family counseling?
- Wasn't he/she willing to attend family counseling?
- Why did you reject family counseling?
- Is it not correct that your children become upset when they observe angry interchanges between their parents?
- Is it not true that your children are disturbed and upset by your separation from your spouse?

***Corporal punishment:***

- Do you discipline your children?
- Do you ever spank your children?

***Holidays:***

- How has your spouse actively discouraged children from sharing in Christmas, etc., with yourself?
- Has your spouse prevented you from having your friends into the home?
- Has your spouse ever invited people into the home over the Christmas period?
- Has your spouse ever asked you to make a meal during this period?



**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- Does your spouse give gifts to children at Christmas?
- Do they accept gifts?
- Does your spouse prevent you from sharing in such celebrations with the children?

***Blood:***

- What do you know about blood transfusions?
- Have you ever read any medical information about blood transfusions?
- Do you know if there are any adverse side effects?
- Have you heard of AIDS and hepatitis being contracted through blood transfusions?
- Have you inquired if there are alternatives?
- Can you point to any medical information that shows more people recover with blood transfusions than any alternative treatment?
- Have you talked to any doctors who operate without blood transfusions?
- Have you discussed the issue of blood transfusions with your spouse?
- Did your spouse say that he/she would let the children die without any medical treatment? What were your spouse's exact words?
- Does your spouse bring your children to your family doctor on a regular basis?
- Do any of your children have health/medical problems at present?
- Do your children at present suffer from any conditions requiring blood transfusions?
- Have your children ever needed a blood transfusion?
- Has your spouse ever denied your children any medical treatment when they were sick?

***Non-Witness spouse's religious activities***

- In what religion were you raised?
- Which religions have you been affiliated with/attended during your life?
- Do you practice any religion? Which religion? Where?
- When was the last church service attended?
- How often have you attended services in last six months? Year? Five years?
- Has your spouse ever tried to prevent you from going to your own church?
- Does your spouse interfere with your taking the children to a church of your choice?
- Do you bring your children with you when you attend church?
- Does your family attend church on a regular basis as a family unit? Which church? How often?
- Which churches have you taken children to? When? Where? When was the last time?
- Describe your activities within your church.
- Do your children attend Sunday School at your church? When?
- Over what period of time have they attended Sunday School?
- Do you believe in the Bible?
- Is the Bible a Holy Book to your church?
- Does your priest (minister) read from the Bible?
- Do you read the Bible? Do you study the Bible? How often?
- Do you have any objection to your spouse reading/studying the Bible? (If so, what and why?)
- Do you have any objection to your children reading/studying the Bible? (If so, what and why?)

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- Do you pray with your children at home? When? How often?
- Do you pray with your children at mealtimes? Bedtime?
- Do you believe in Hell?
- Does your church teach your children to believe in Hell?
- What form of birth control do you practice?
- Is this a form of birth control that is accepted/approved by your church?

***Status of children:***

- What are the ages of your children?
- What are the hobbies, interests, aptitudes, etc., of your children? (Note: Ask about the children individually; often a rigid parent will not know his individual children well.)
- Where do your children attend school?
- What grades are they in?
- Are your children doing well in school? What are their marks? (Note: See if parent can describe how each child is doing individually.)
- What do the report cards show? (Note: Seek order compelling discovery of the children's report cards.)
- Do the teachers find their progress acceptable?
- Have you seen the children during classes?
- Do your children have friends?
- Do your children have friends at school? Have you inquired?
- So you consider your children to be normal children?
- Are you proud of your children?

***Religious activities of Witness spouse:***

- Is your spouse free to choose a religion for himself/herself?
- Do you object to him/her going to church?
- If your spouse were to attend services at a Jewish Synagogue or Mormon Tabernacle, would that be objectionable to you? If not, why not? (Note: Repeat above question for Christian Science Church, Mennonite or Amish Church.)
- Would you permit your children to attend these services with your spouse?
- Do you object to your spouse attending meetings at the Kingdom Hall? Why?
- Do you object to your spouse bringing your children to the Kingdom Hall? Why?
- When does your spouse attend church meetings?
- What are the hours?
- Please tell me what hours your spouse spends in church work. (Monday, Tuesday, Wednesday, etc.)
- Is this at the same time that the children are in school?
- How has your spouse forced the children into her religion? Give examples.

***If non-Witness spouse alleges that beliefs of Jehovah's Witness spouse will harm children:***

- What religious beliefs of your spouse will damage children? (Provide list and examples.)
- What religious practices of your spouse will damage children? (Provide list and examples.)
- What has been your spouse's "indoctrination of the children"?
- What examples can you point to?
- Is reading the Bible indoctrination?

## **SAMPLE CROSS-EXAMINATION QUESTIONS FOR NON-WITNESS PARENT**

- How have your children been “disrupted,” “confused,” “emotionally disturbed,” “upset,” etc., by your spouse’s religious beliefs/practices? (Give examples.)
- Where is this “confusion,” “anxiety” reflected in your children’s school reports?
- What do the teachers say?
- Do the children have a problem with your spouse’s faith or do you?
- Do the children love your spouse? Do they enjoy being with your spouse?
- Is this evidence of children who are “worried and anxious”?

### ***Non-Witness spouse’s attitude to Witness spouse:***

- Has your spouse ever tried to stop you from going to your own church?
- Does your spouse allow you to take the children to the church of your choice?
- Have you ever attended a meeting of Jehovah’s Witnesses to hear what is taught?
- Have you ever read publications of Jehovah’s Witnesses? What have you read? (Note: If affirmative answer given, ask name, page, and date of publication.)
- Have you talked to any ministers of Jehovah’s Witnesses to ask them questions?
- Have you associated with Jehovah’s Witnesses on a social basis?
- Do they have parties? Do they enjoy other recreation? What inquiries have you made?
- Are “birthdays, Christmas, Halloween, and New Year’s” the only enjoyable activities there are in your life?
- Does your spouse, as one of Jehovah’s Witnesses,

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR NON-WITNESS PARENT**

teach your children honesty? To tell the truth?  
Respect others' property?

- How do you know Jehovah's Witnesses "do not recognize the government of the United States"? Why were you told this? (Note: Or any other allegations raised by non-Witness spouse.)
- What do they not recognize?
- Do they pay taxes? Do they obey the laws?
- Do they encourage honesty and good citizenship?
- What has been your response when your spouse talks to you about religion?

***Note: Fit the following questions to the facts of individual case:***

- Have you not admitted to being frustrated?
- Did you not on one occasion rip up a book?
- Is it surprising that a wife/husband would not want to talk to her/his husband/wife about such matters when reaction is always one of anger? (Note: If non-Witness spouse has used words such as "fanatic," "proselytizing," "religious intransigence," "obsessed," "indoctrination," ask him/her to define these words as he/she understands them. These may be his/her lawyer's words and not his own.)
- Do you respect the government of the United States?
- Do you respect the Constitution of the United States?
- Do you respect the constitutional provision that guarantees your spouse's freedom of worship?
- Are you so intolerant that the minute your spouse wants to practice the religion of his/her choice, you want to break up the family?
- Is that how you demonstrate your respect for the Constitution of the United States? The Bill of Rights? The government of the United States?

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- Is your spouse's religion the problem, or is it your intolerant attitude?

***If non-Witness spouse alleges Witness spouse made an agreement as to the religion of the children:***

- What is the agreement you are referring to?
- When did your spouse agree that he/she would not involve your children in the teachings of Jehovah's Witnesses (or raise them as Catholics, etc.)?
- Where is the agreement?
- When was it signed? (Note: Seek an order to compel discovery of agreement.)

***Child's freedom of choice:***

- Do you object to your child being exposed to different viewpoints? Religious viewpoints?
- Do you object to the school teaching children about different nations/cultures and their religions?
- Do you object to your children learning about the religious viewpoints of their friends and their friends' families?
- Do you want to prevent your children from learning about their other parent's views?
- Does your spouse prevent the children from knowing about your religious views?
- Why do you want to stop the children from learning about his/hers?
- Should your children be allowed to choose which religion they wish to follow?
- How can a child be allowed to choose his/her own religious persuasion unless he/she is exposed to his/her parents' religious choices?
- Do you love your children only so long as they are in your religion?

**SAMPLE CROSS-EXAMINATION QUESTIONS FOR *NON-WITNESS PARENT***

- **Will you still love your children if they become Catholics, Jews, members of the United Church, Mormons, or Jehovah's Witnesses?**
- **What have you told your children about Jehovah's Witnesses?**



**SAMPLE DIRECT EXAMINATION  
AND SAMPLE RESPONSES  
FOR *LOCAL ELDER***

DIRECT EXAMINATION AND SAMPLE RESPONSES FOR *LOCAL ELDER*

- What is your name? What is your occupation?  
Where do you live?
- What sort of instruction does the church encourage  
parents to provide their children?

(For example, you might wish to share some of the following educational and culturally-enriching subjects from the Society's publications:

***Arts and Crafts***

"You, Too, Can Learn Calligraphy!" *Awake!*,  
August 8, 1985, p. 25-27

"Oil Painting—Wholesome Relaxation," *Awake!*,  
May 8, 1974, p. 21-23

"A Closer Look at Famous Works of Art,"  
*Awake!*, January 8, 1982, p. 16-20

"Keeping Small Hands Busy," *Awake!*, May 8,  
1985, p. 24-27

"Are We Losing the Art of Learning?" *Awake!*,  
September 22, 1982, p. 22, 23

***Hobbies and Recreation***

"Choosing a Hobby Wisely," *Awake!*,  
November 8, 1961, p. 13-16

"Beauty in the Rocks," *Awake!*, September 22,  
1969, p. 20-22

"The Value of Toys," *Awake!*, January 8, 1971,  
p. 9-12

"Stamp Collecting as a Hobby," *Awake!*, July 8,  
1971, p. 20-23

"Is Home Sewing for You?" *Awake!*, August 22,  
1973, p. 9-12

"Knitting as a Lifetime Hobby," *Awake!*, May 8,  
1978, p. 23-26

"The Origin of Playing Cards," *Awake!*,  
August 22, 1978, p. 9-12

"Home Computers—Are They for You?"  
*Awake!*, February 8, 1984, p. 12-15

"Cooking Spaghetti Giulia's Way," *Awake!*,  
January 8, 1986, p. 25-27

"Cheese—Are You a Connoisseur?" *Awake!*,  
August 8, 1986, p. 25-27

"Will the Abacus Survive Again?" *Awake!*,  
December 8, 1986, p. 19

"Young People Ask . . . What About After-School  
Activities?" *Ibid.*, p. 16-18

"Exploring Earth's Last Great Frontier,"  
*Awake!*, December 22, 1986, p. 16-19

### ***Music and Entertainment***

"What Should Your Child Read?" *Awake!*,  
March 22, 1978, p. 16-21

"Can Television Benefit Us?" *Awake!*, April 22,  
1978, p. 4-6

"Control Your Television!" *Ibid.*, p. 17-20

"What Do You Do for Entertainment?" *Awake!*,  
January 22, 1979, p. 3, 4

"Don't Ignore the Need for Entertainment,"  
*Ibid.*, p. 5-8

"Playing Indoor Games," *Ibid.*, p. 9-12

"Understanding and Enjoying Music," *Awake!*,  
February 8, 1979, p. 20-24

"Music Lessons for Your Two-Year-Old?"  
*Awake!*, February 22, 1980, p. 25-28

"A Sense of Humor—God's Gift," *Awake!*,  
September 8, 1980, p. 25-28

"Begin Teaching Your Baby to Read," *Awake!*,  
September 22, 1982, p. 23-27

"What Is Your Kind of Music?" *The Watchtower*,  
January 15, 1983, p. 3, 4

"Bridge That Gap With Conversation," *Awake!*, June 8, 1983, p. 24, 25

"They Are Helping Children to Read," *Awake!*, June 22, 1985, p. 23

"Reading—It Can Enrich Your Life," *Awake!*, September 8, 1985, p. 3-8

"Young People Ask . . . How Can I Have a Good Time?" *Awake!*, November 8, 1986, p. 10-12

### ***Sports***

"Winter Can Be Fun," *Awake!*, December 22, 1958, p. 8-11

"Flying a Kite Can Be Fun," *Awake!*, March 22, 1973, p. 24-26

"How Long Could You Survive in Deep Water?" *Awake!*, June 22, 1973, p. 17-19

"Discovering the Wonderful World of Walking," *Awake!*, August 22, 1973, p. 24-27

"You Can Sail Safely," *Awake!*, September 8, 1980, p. 23-25

"My First Marathon," *Awake!*, December 22, 1980, p. 27, 28

"Lessons You Can Learn from Sports," *Awake!*, July 22, 1981, p. 25-27

"Sports and the Family—A Balanced View," *Awake!*, May 22, 1982, p. 9-11

"Surfing—What's It All About?" *Awake!*, August 22, 1982, p. 12-16

"Young People Ask . . . Should I Go In for Bodybuilding?" *Awake!*, December 22, 1986, p. 13-15)

(Other general topics include Animals and Plant Life, Economics and Employment, Health, Human Relations, Lands and Peoples, Science, World Affairs, and many more.)

DIRECT EXAMINATION AND SAMPLE RESPONSES FOR *LOCAL ELDER*

- How does the church assist parents?

(For example, you might consider *Bible Story* book and illustrate how the book is organized and how it teaches principles such as honesty, respect for authority, the value of obedience, etc.)

- Is this publication used only by Jehovah's Witnesses?
- Is this the only type of publication the church provides?

(You may want to refer to and give brief résumé of *Great Teacher* and *Youth* books and "Young People Ask" series and discuss in similar fashion as *Bible Story* book résumé.)

- How important do Jehovah's Witnesses consider such parental instruction of children?

(Referring to scriptures such as 1 Timothy 5:8, Ephesians 6:1-4, and Proverbs 1:8, 9, you may want to give Bible examples of parental instruction which benefited offspring to emphasize this fundamental Bible belief. Also see "Rearing Happy Children in a Troubled World," *The Watchtower*, January 15, 1982, p. 12.)

- Can you describe what takes place at the meetings of Jehovah's Witnesses?

(Many criticize the meeting schedule as one which is overly demanding for a young child. You may want to highlight that they are religious, educational, promote a warm familial spirit, and that young people make many social contacts at these meetings.)

- Why do Jehovah's Witnesses visit people in their homes by calling from house to house?

(Highlight that visits are made with interested people to share good news of bright future for all mankind. Also see *Kingdom Ministry*, December 1977, "Are You Instructing Your Family?" and *Kingdom Ministry*, February 1979, "How Does God's Kingdom Affect Your Family?")

- Can you describe what takes place at such visits?

(There are various positive features to highlight. For example, many people invite Jehovah's Witnesses in and engage in upbuilding conversations; people who are not interested are left on a friendly basis; many visits are made on people who are also social contacts and conversation is not restricted to religious beliefs; many home visits are like dropping in to see friends; children who accompany parent learn to be outgoing and take an active interest in people from various backgrounds.)

- What view does your church encourage children to take toward a parent who is not one of Jehovah's Witnesses?

(Ephesians 6:1 is to be applied to one who is not one of Jehovah's Witnesses, as well as to a parent who is disfellowshipped. See *w10/15/81*, p. 19; *g10/22/75*, p. 27, 28; *g9/22/70*, p. 27, 28.)

- What view does church take toward people of other religions?

(Jesus taught love neighbor as self, includes all; we respect others' right to worship as they choose.)

- Does church teach that young people should learn only about religion of Jehovah's Witnesses?

(No. Consider following objective consideration of other religions in our publications:

- Young People Ask . . . Why Should I Accept My Parents' Religion?,  
*Awake!*, November 22, 1986, p. 13-15;
- Young People Ask . . . Is the Bible Relevant for Me?,  
*Awake!*, May 22, 1986, p. 12-14;
- A Non-Violent World—Did Ghandi Show the Way?,  
*Awake!*, April 8, 1984, p. 3-12;
- What Is Religion Doing for Mankind?,  
*Awake!*, January 8, 1984, p. 3-14;
- The Latter-Day Saints in Today's World,  
*Awake!*, December 22, 1982, p. 24-27;
- Moon's Unification Church—What Does It Believe?,  
*Awake!*, September 8, 1982, p. 10-15;
- The Church of England—An "Endangered Species"?,  
*Awake!*, July 8, 1981, p. 25-27;
- Why So Many Religions in South Africa?,  
*Awake!*, January 22, 1981, p. 12-15;
- A Look at Hindu Views of Life and Death,  
*Awake!*, February 8, 1977, p. 16-23;
- Is Buddhism the Way to Enlightenment?,  
*Awake!*, January 8, 1974, p. 16-19;
- Test Your Religious Knowledge,  
*Awake!*, April 22, 1961, p. 4-27;

DIRECT EXAMINATION AND SAMPLE RESPONSES FOR *LOCAL ELDER*

Examining Islamic Teachings,  
*Watchtower*, November 1, 1953,  
p. 653-656.

- Are there substantial differences between basic principles of morality as taught by Jehovah's Witnesses and the Catholic (or whichever) Church?  
(Principles of Ten Commandments are common to both groups.)



**SAMPLE RÉSUMÉ OF *BIBLE STORY* BOOK**

## RÉSUMÉ OF *BIBLE STORY BOOK*

This book is designed for young children. (See blue block on publisher's page of *Bible Story* book.) This book would be the basis for any religious communication between the parent and the child, up to about age seven or eight.

The teachings are positive as will be shown by analysis. No serious-minded parent could object, regardless of particular religious association. The lessons are objective.

The lessons in this book are NOT doctrinal. They are lessons on loyalty, honesty, morality, human relationships, and self-discipline.

If, for example, the mother is a serious Catholic, there is no real conflict between what the father would communicate to the child and what the mother would teach.

Following is a list of chapters that might be referred to and the lesson in each:

**INTRODUCTION:** The book is a lesson in chronological Bible history.

**CHAPTER 2:** "A Beautiful Garden"  
Used to introduce very young child to the animal kingdom and to teach basic lessons in biology. Note that all the animals in the picture are in pairs, and they have babies. Allows introduction of such basic subjects as reproduction.

**CHAPTER 5:** "A Hard Life Begins"  
Child can be introduced to the value of respect and obedience to authority, whether parental or community, e.g. police and courts.

**CHAPTER 19: "Jacob Has a Big Family"**

Child is introduced to the concept that producing a family is an honor and a privilege. Emphasizes unselfishness exhibited in production of a large family. Families contribute to growth of community and nation.

**CHAPTER 20: "Dinah Gets into Trouble"**

Introduces child to the dangers of associating with immoral and dishonest persons. Teaches morality at an early age without specifics. Aversion to sexual abuse of women and discrimination.

**CHAPTER 37: "A Tent for Worship"**

This chapter shows that child is taught respect for a house of worship and all the equipment and material used in the house of worship. Child is taught respect for altar and priests.

**CHAPTER 44: "Rahab Hides the Spies"**

Child learns that we do not refuse to help people or show kindness to people even though we do not approve of what they do. Rahab was a prostitute.

**CHAPTER 51: "Ruth and Naomi"**

No better lesson in family loyalty and teaching child value of respect for older persons and responsibility to help senior citizens.

RÉSUMÉ OF *BIBLE STORY BOOK*

- CHAPTER 55:** "A Little Boy Serves God"  
Very young children can learn respect for religious service, respect for God, and for legitimate priesthood. (Use the picture.)
- CHAPTER 63:** "Wise King Solomon"  
(Use the picture.) What an illustration of the value of judicial wisdom and family love. Builds respect for modern-day judiciary. The mother would rather give up the child than have him injured. In terms that a very young child can understand. Also shows that wisdom is better than materialism.
- CHAPTER 71:** "God Promises a Paradise"  
This is what the child is being taught to look forward to. Is it bad? Gives hope and optimistic future in a world where many turn to suicide.
- CHAPTER 75:** "Four Boys in Babylon"  
Teenagers do not have to give in to pressure from their peers. The old virtues and basics are worth standing up for.
- CHAPTER 77:** "They Would Not Bow Down"  
(Sequel to chapter 75.) Children learn that there is a time in life to be firm for right principles.
- CHAPTER 84:** "An Angel Visits Mary"

RÉSUMÉ OF *BIBLE STORY BOOK*

- CHAPTER 85:**           **“Jesus Born in a Stable”**  
Child is taught respect for the circumstances of Jesus’ birth. (Use the picture.) Child learns the real value of the birth and life of Jesus without influence from commercialism. Who can object?
- CHAPTER 86:**           **“Men Guided by a Star”**  
Same points. (Use the picture.)
- CHAPTER 94:**           **“He Loves Little Children”**  
Jesus used children to teach lessons of flexibility, humility, and respect. Children can understand this better than adults.
- CHAPTER 95:**           **“The Way Jesus Teaches”**  
Who can object to a child learning the story of the Good Samaritan? It is universally respected. We even have “Good Samaritan” hospitals in some locations. Child learns history and background of a very common expression as well as the lesson in human responsibility that is taught. Learns racial discrimination to be shunned.
- CHAPTER 99:**           **“In an Upstairs Room”**  
Jesus introduced the Last Supper. Respected by most religions, including Catholicism. Why shouldn’t a child learn the history of its origin?
- CHAPTER 110:**       **“Timothy—Paul’s New Helper”**  
The ministry is a respected and honorable profession.

**CHAPTER 115: "A New Paradise on Earth"**

(Use the picture.) This is what the child is taught to look forward to.

**SAMPLE DIRECT EXAMINATION AND  
SAMPLE RESPONSES  
FOR *YOUNG WITNESSES***

**DIRECT EXAMINATION & RESPONSES FOR YOUNG WITNESSES**

- What is your name?
- How old are you?
- Where do you live?
- Are you one of Jehovah's Witnesses?
- When did you become one of Jehovah's Witnesses?
- Do you have any brothers or sisters?
- Are they Jehovah's Witnesses?
- How is your relationship with them?
- Tell us something about your father and mother:
  - Are they Jehovah's Witnesses?
  - If not, what religion?
  - What are their occupations?

***If Married:***

- Is your husband/wife one of Jehovah's Witnesses?
- Are his/her parents Jehovah's Witnesses?
- What are their occupations?
- What is your relationship with them?
- How is your relationship with your parents?
  
- How old were you when your mother/father became one of Jehovah's Witnesses?
- Have you therefore been exposed to different religious views?
- Can you tell us how this has affected you?
  - (Helped to understand other views; be tolerant; appreciate divergence of opinions; respect for other religions; listen to other people's comments; in general to be a more fulfilled and balanced person, etc.)



**DIRECT EXAMINATION & RESPONSES FOR *YOUNG WITNESSES***

- Did you find that this difference of religion was confusing to you?
- Did it cause you any problems?
- How has your association with Jehovah's Witnesses affected your life?
- Did it help you avoid any problems?

(Comment regarding positive ways association with Jehovah's Witnesses has helped; to have a purpose in life; to help other people; to be good citizens; good morals; be selective as to conduct, company, etc.)

- What do you do for recreation?
- What about social activities?
- What about family activities?
- How did you do in school?
- Did you have any problems?
- Did you get along with other students?
- The fact that you are one of Jehovah's Witnesses, do you feel that hindered your situation?
- What are your plans for the future?

## **EVIDENCE OF YOUNG PEOPLE:**

This can be used to show that they are normal. Identify and interview young people from local congregations who have been raised as Jehovah's Witnesses and, in the eyes of the presiding overseer, are spiritually minded but also enjoy the normal healthy things that young people do. They don't have to be competitive to enjoy sports. Be careful that they don't get the impression that they are in a demonstration at the circuit assembly, when they would show that the first things in life are service and going to the Kingdom Hall. Show hobbies, crafts, social activity, sports, and especially plans for the future. Be careful they don't all say that they are going to be pioneers. Plans can be trade, getting married and having children, journalism, and all kinds of other things. Maybe you can show an interest in art and the theater. They must be clean, moral, honest, but with the interests that you would expect from other young people.

*Have you been exposed to different religious views since youth? How has this affected you?*

Learned to be tolerant and appreciate divergence of opinions; while personally choosing teachings of Jehovah's Witnesses, have learned to respect others' right of choice.

*How has your association with Jehovah's Witnesses affected your life?*

Comment on positive value of truth; have a purpose in life; take interest in other people; good morals; obey the law, etc.

*Do you go from house-to-house? Describe your reaction.*

Educational value of social contact; learn how to meet people, strike up a conversation and reason on a variety of topics. At an early date learned

about the many different views people have. Meeting people at doors overcame shyness and lack of confidence. Ease of dealing with people is valuable now in business as well as religious and social activities.

*Is it not depressing when you are rejected at a door?*

No. We have something good to share with those who want to listen. Each individual has the right to his opinion. If rejected, we can leave and find someone who does want to talk a few doors away.

*Are not three religious meetings a week boring?*

No. Meetings are interesting. Participate in Theocratic Ministry School and learn how to talk to people. Associate with other young people at meetings. Make social and recreational arrangements.

*What do you do for recreation, social activities, family activities?*

Describe a balanced range of activity.

*How did you do in school? Did you have any problems? Did you get along with other students? Did your association with Jehovah's Witnesses hinder your education?*

Not at all; kept me out of trouble with the drug scene, immorality, illegitimate children, shoplifting, etc. Helped me take a mature view of the need for an education so I could do something useful and interesting with my life.

**LIST OF SOURCE MATERIAL**  
*Professional Studies in*  
*Child Psychology*

1. Freud, *Child Observations and Prediction of Development*, 13 *Psychoanalytic Study of the Child* 92, 97, 98 (1958) (emphasis added):

*It was Ernst Kris himself who drew our attention to the hopelessness of such clinical foresight in what he had described as the first phase of psychoanalytic child psychology. While we knew no more of the predestined sequences of development than the libidinal phases and "some crucial conflicts and typical danger situations related to the maturational sequence" (p.27), prediction was not possible. There were too many unknown factors which determined the outcome of the child's reactions to his experiences and their genetic, economic, and dynamic interrelations. . . . There remain a number of factors which make clinical foresight, i.e., prediction, difficult and hazardous. I name three of them here. (1) There is no guarantee that the rate of maturational progress on the side of ego development and drive development will be an even one; and whenever one side of the structure outdistances the other in growth, a variety of unexpected and unpredictable deviations from the norm will follow. (2) There is still no way to approach the quantitative factor in drive development, nor to foresee it; but most of the conflict solutions within the personality will, in the last resort, be determined by quantitative rather than by qualitative factors. (3) The environmental happenings in a child's life will always remain unpredictable since they are not governed by any known laws.*

2. Thomas & Chess, *Genesis and Evolution of Behavioral Disorders: From Infancy to Early Adult Life*, 141 *Am. J. Psychiatry* 9 (1984):

As we grow from childhood to maturity, all of us have to shed many childhood illusions. As the field of developmental studies has matured,

we now have to give up the illusion that once we know the young child's psychological history, subsequent personality and functioning is *ipso facto* predictable.

3. J. Ziskin, *Coping with Psychiatric and Psychological Testimony*, 104, 105 (2d ed. Supp. 1977) (emphasis added):

*The picture concerning reliability and validity of psychiatric and psychological evaluations remains grim, even in regard to clinical usages, let alone the more rigorous requirements for use in evidence. The current literature reflects widespread agreement that reliability and validity are unacceptably low.*

4. H. Schaffer, *The Growth of Sociability* 15-17 (emphasis added):

*Parents may be firmly convinced that the particular experiences encountered by their baby will mark him for good or ill for the rest of his life, but when we turn to scientific support for this assertion there is as yet not a single study available which firmly and without ambiguity demonstrates that a specific experience impinging at one particular point of time in early human development will leave permanent effects on that individual. Birth trauma, breast or bottle feeding, type of toilet training, swaddling practices—whatever their effects at the time, the lasting imprint of such events has not been demonstrated. The aphorism that the child is father to the man remains an article of faith rather than a scientifically supported conclusion.*

*What are the forces that come to shape infant behaviour? Here we find one of the major issues that has divided psychologists in the past into,*

on the one hand, those who see the child as essentially an inert blob of clay that must be moulded by forces impinging upon him from the environment and, on the other hand, those who consider the child preformed and look upon development as largely an unfolding of inherent tendencies. *It is easy to assert that heredity and environment must both play a part and there are few who would go against such a safe viewpoint. Yet in practice, and particularly so in relation to early development, we find the divergence of opinion a real and often a heated one.*

5. Chess, *Developmental Theory Revisited*, 26 Can. J. Psychiatry 110, 111 (1979) (emphasis added):

*The accumulation of research data in recent years has by now made it clear that our "inability to make empirical predictions about later personality from the early years" is indeed "evidence of a developmental reality." These data have come most dramatically from the major longitudinal studies—the type of study which is uniquely suited to examine the issue of continuity over time. The same message has come from all (5-7, 12), reaffirming the findings of our own longitudinal studies. Similar conclusions have come from the two major comprehensive reviews of the recent literature by Sameroff (9) and Clarke and Clarke (2).*

...

*The data offer no firm support for the popular belief that certain events during the first year can produce irreversible consequences in either human or infrahuman infants (5).*

6. Ellsworth & Levy, *Legislative Reform of Child Custody Adjudication*, 4 L. Soc'y Rev. 199 (1969):

In general, studies show no clear advantage for

trained judges; psychologists are not consistently better or worse than nonpsychologists (e.g., secretaries, college students, nurses), and clinical training and experiences does not improve the accuracy of global judgments. If anything, clinical training and experience may be somewhat detrimental and reduce judgmental accuracy, or at least introduce systematic biases such as greater emphasis on pathology and less favorable prognoses. [Mischel, 1968: 116; see also Sarbin et al. 1940].

7. Dewing & Taft, *Some Personality Characteristics of the Parents of Creative Twelve-year-olds*, 41 J. Personality 81, 82 (1973):

A second demographic variable found to be related to creative ability was unusual religious belief. In particular, a disproportionately large number of highly creative children were Jehovah's Witnesses. Four children from the total sample of 394 were members of this sect, and all four showed high creative ability. The girl who gained the highest total score on the Torrance tests, and the girl who was the only child, male or female, to be included in the top 20 percent of all five performance measures, were both Jehovah's Witnesses.

8. Sanua, *Religion, Mental Health and Personality: A Review of Empirical Studies*, 125 Am. J. Psychiatry 1206 (1969):

What may be said at this point is that a substantial number of additional empirical findings would be necessary before any valid conclusions could be drawn as to the relationship between religiousness and mental health.



9. Frideres, *Offspring of Jewish Intermarriage: A Note*, 35 Jewish Soc. Stud. 156 (1973):

The results concerning the remaining dependent variables show that little difference is evident between children of mixed and homogamous marriages. The data relevant to this point does not substantiate previous research which suggested that children from mixed marriages would be more psychologically "unstable" than children from homogamous marriages.

10. Lynch, *Mixed Marriages in the Aftermath of "Matrimonia Mixta"*, 11 J. Ecumenical Stud. 653 (1974) (emphasis added):

*Both parents should actively participate in the religious upbringing of the children and not view the responsibility as one of passive "non-interference." Pedagogically as well as pastorally the combined religious influence of both parents is most important.*

11. R. Mnookin, *Child-Custody Adjudication: Judicial Functions in the Face of Indeterminacy*, Vol. 39, No. 3, 1975:

While psychiatrists and psychoanalysts have at times been enthusiastic in claiming for themselves the largest possible role in custody proceedings, many have conceded that their theories provide no reliable guide for predictions about what is likely to happen to a particular child. Anna Freud, who has devoted her life to the study of the child and who plainly believes that theory can be a useful guide to treatment, has warned: "In spite of . . . advances there remain factors which make clinical foresight, i.e., prediction, difficult and hazardous," not the least of which is that "environmental happenings in a child's life will always remain unpredictable since they are not governed by any known laws."

## PROFESSIONAL STUDIES IN CHILD PSYCHOLOGY

The difficulty of making accurate predictions is shown clearly by a study undertaken by Joan Macfarlane and her associates in Berkeley, California. Using various tests and interviews, the Berkeley group, during a thirty-year period, studied a group of 166 infants born in 1929. Their objective was to observe the growth—emotional, mental, and physical—of normal people. As Arlene Skolnick observed, “Over the years this study has generated several significant research findings, but the most surprising of all was the difficulty of predicting what thirty-year-old adults would be like even after the most sophisticated data had been gathered on them as children.”

**PREPARATION FOR PSYCHOLOGICAL  
OR  
PSYCHIATRIC EVALUATION**

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

Today the courts rely more and more on the evaluations and recommendations of psychologists and psychiatrists in determining the best interest of a child. The process of psychological or psychiatric evaluation may be relevant to the issue of whether the religious teachings and beliefs of Jehovah's Witnesses have any harmful effect on children. Therefore, there is a growing likelihood that both spouses as well as the children will receive some type of psychological evaluation, whether at the insistence of the court or at the suggestion of an attorney in preparing evidence to present the case. The objective of this discussion is to help you understand and prepare for a psychiatric or psychological evaluation.

In the past many have feared or distrusted mental health care professionals. There is no basis or need for such preconceived fear or distrust. Keep in mind that the primary objective of the court proceeding and the psychological or psychiatric examination is to determine which parent is best suited to provide the child a secure and safe home. Therefore, certain matters must be kept clearly in mind:

**1. Do not be unduly defensive or suspicious of the health care professional's role in the evaluation process.** Many people who work in psychology and psychiatry have an interest in people and care about people. They give their subjects the benefit of the doubt. You should assume that they will try to put your best interests first if you cooperate with them. Try not to respond in a defensive or hostile manner. The mental health care professional with whom you are working has a job to do. Cooperate with him and he will try to cooperate with you.

**2. Everyone has had problems or difficulties in their past and no one comes from a perfect background.** When questioned about difficult areas or problems in the past, be honest and frank. Try to show how the truth has helped you to overcome psychological scars or problems, but do not exaggerate or paint the truth in an unrealistic light, claiming that all your problems have gone away

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

since you have learned Bible principles. Show how Bible principles are helping you to cope with your problems and present them in an honest, objective manner.

**3. Do not use the psychiatric session as an opportunity to present Bible literature and witness about the Kingdom hope.** The health care professional selected to evaluate you and your family has an objective in mind. If court appointed, he is required to present his findings to the court and you will want to make it easy for him to do his job. The psychologist is probably not interested in the Bible principles that guide your life. Rather, he is interested in understanding how you are applying Bible principles in your home in order to produce a healthy and well-balanced environment in which to raise the child. In some circumstances it may be appropriate for you to share your hope about God's Kingdom during an interview, but you should not make it your objective to preach to the mental health care professional who conducts the interview.

**4. Show that you have a balanced view and that the truth has helped you to maintain such a view.** Do not present yourself or the truth as rigid or obsessive. Rather, show the evaluator that you are a reasonable person by showing your flexibility and responding in an open and nondefensive manner. For example, questions about religious practices such as not celebrating holidays will be a part of the psychological examination. The mental health professional will be interested in determining how you, as a good parent, handle this practice with your child. He will want to know whether or not you are sensitive to the fact that your child may feel unusual, left out, or alienated by what may be a recent change in your religion.

You will want to take the initiative by showing that you have a close and a loving bond with your child, that you understand your child's honest reactions to your religious practices, that you have helped your child to develop a sense of security

about the practice of his religion, and that he is not merely parroting the expressions that you have provided for him. If your child is to be tested, you should also try to prepare him or her to face the experience with an open and positive attitude.

**5. If you do not understand a question, ask for clarification.** If you are asked a question you do not understand or if you feel that the interviewer is getting at something other than what is stated, you should calmly ask the evaluator to restate or rephrase the question so that you may provide an accurate answer.

**6. You may be asked questions about your refusal to take blood or blood products.** You may be questioned about whether you would permit your child to die because of your refusal to consent to a blood transfusion. Rather than just explaining your hope in your child's resurrection in God's new world and deemphasizing the importance of your child's life in this system, show a balanced view and state in positive terms the medical steps that you would take to assure the child had the best possible medical treatment available. Be prepared to discuss with the evaluator specific alternative medical treatments which would be available to the child if some doctor was of the opinion that blood was needed. You do not want to give the impression that your religion requires you to allow your child to die should a medical emergency arise.

**7. What is not said is often as important as what is said.** Remember to maintain good eye contact with your evaluator. Sit up straight and try to relax as you speak with the evaluator. Act as if you were speaking to someone in whom you could confide. Use a calm and measured tone of voice. Put expression and feeling into your voice so that you are able to communicate in an honest and natural way. Do not feel intimidated by your evaluator but try to put your evaluator at ease.

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

**8. You are on display as one of Jehovah's Witnesses.** When appearing for the evaluation remember to be punctual and to dress in an appropriate manner, a manner befitting a minister of Jehovah. Since the health care professional is trained to do this type of evaluation, to the degree reasonable allow him to ask the questions and do not try to control or restructure the interview. Not every question has a hidden meaning. You do not want to present yourself as one who is paranoid or afraid to communicate honestly.

In addition to a conversational, clinical evaluation, you may be asked to take certain psychological tests which are designed to help the evaluator understand your personality and your ability to care for the best interests of the child. There are a variety of tests which may be used. Some tests focus on your intelligence and thinking ability. The Wechsler Intelligence Test appears to be a widely administered test. The Wechsler test is a series of tests and may be used for adults as well as children over the age of four. In addition to testing intelligence, this series of tests may also be used to measure the examinee's ability to formulate ideas and overall intelligence.

Other types of tests are designed to categorize the type of personality. A commonly used test is the Rorschach Test. It uses ink blots. The examinee will be shown a series of ink blots and will be asked to describe what they look like, or what the examinee thinks they might be. There are no right or wrong answers. However, if you have a defensive or hostile attitude about taking the exam, this attitude may influence the findings. Your responses will be recorded and scores, ratings, and interpretations will be derived therefrom. This test is used for adults as well as children of school age. Other tests involve use of pictures or diagrams, word associations, sentence completion, or expressive drawings.

Often more objective tests and scales are used. For example, the Minnesota Multiphasic Personality Inventory (MMPI) is widely used to test for certain personality traits. It consists of about 550 statements and

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

it calls on the examinee to answer "true," "false" or "cannot say." The topics include family relationships, sexual and religious attitudes as well as fears and problems within the family. The interpretation of the examinee's MMPI score will take into consideration the examinee's background, ethnic group, sex, age, and education.

Keep in mind that the objective of a psychological or psychiatric evaluation is to determine whether or not you are the parent who will provide the better home for your child. The mental health professional is interested in determining whether or not you have the personality and emotional stability to provide for the physical, mental, and emotional needs of your child. You must be prepared to show in a positive, honest and frank manner that you will provide for your child's welfare and best interests and that you are the parent more capable of doing so. Do not be quick to attack your former spouse. Rather, be prepared to show and present in an honest way the loving and caring concern you have for your child and the way in which you are able to express this to the child. Show that you have already developed a close, loving relationship with your child and that there is nothing in your personality or religious practices that would require the child not to be placed in your custody.

## COPING WITH PSYCHIATRIC EVALUATION

To help you understand how the foregoing general principles can be applied, the following examples of questions and answers are provided to assist you in a psychological or psychiatric evaluation. As indicated, a person being evaluated should not be unduly defensive or suspicious of the health care professional's role in the evaluation process. You would want to answer any questions openly, understanding that it is the role of the mental health care professional to elicit information from you. The following is an example of how *NOT* to respond during the interview:

**Q:** Can you tell me about why you and your ex-husband divorced?



## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

A: Why do you want to know? I know he's probably been spreading those lies about me. You're probably going to take his side anyway.

Q: Well, no. But your husband mentioned that your religious beliefs have been a source of differences. Can you tell me a little bit about your religious beliefs?

A: You know, you psychiatrists don't even believe in the Bible. You're always negative against someone who practices the Bible. Matthew said we'd be persecuted by persons like you. Besides, you psychiatrists are more mixed up than anyone. I hear you get more divorces and commit suicide more than anyone else.

Q: I don't know if I agree with all that. But I would like to know more about your religious beliefs.

A: Well, I'm glad you asked. I've got my Bible here and I'd like to read you these scriptures. Also, I brought several articles from *The Watchtower*, the *Reasoning* book and this *Blood* booklet. Here—take all of these and you can learn what the Bible says.

Q: Okay. Your husband says here that you don't believe in celebrating Christmas.

A: It's right here in the *Reasoning* book about holidays. Just read it. If you celebrate Christmas, it's a lie. Christ was not born on December 25. We're not liars, so we don't lie to our children. I don't know if you lie to your kids, do you? I can't believe how people lie to their children. Did you know that Christmas gifts cause depression in children?

Honest, direct, and nondefensive responses give a clear and accurate picture. The examiner does not expect that you have had a perfect life. Obviously, there have been some problems or rocky areas in your life. Therefore, you should feel free to talk about these situations objectively and with confidence. Here is an example to help you see the difference from the preceding interview:

PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

Q: When did you get married to John?

A: I married him when I was just 19 years old. I was glad to get out of the house, and I really thought I loved him when we were married.

Q: Oh, I see. And how long did the marriage last?

A: We were married for 10 years. It wasn't a good marriage right from the start.

Q: What do you mean by that?

A: We were never close. I was young, and he was young. There was a lot of arguing and fighting about everything. When we had a child, things got worse. Neither one of us were ready for being parents, especially him.

Q: And what do you mean when you said 'he wasn't ready for being a parent'?

A: For the first six months he rarely even held Lisa. He would stay out late at night because she cried a lot. You know, I really think he loves Lisa now, but he rarely showed her much attention when we were together.

Q: I see. And what brought about the end of the marriage?

A: When he had an affair, I just couldn't take it anymore. He claims I drove him to it by becoming one of Jehovah's Witnesses. He was always highly critical of my beliefs and even became outwardly hostile at times. I think he was just using my religion as an excuse. When I wouldn't take him back, he wanted to get back at me by trying to take custody of my Lisa.

Q: And why do you think he was so critical of your beliefs?

A: Well, doctor, I'm not a psychiatrist, but I think he was insecure about my sincere and dedicated interest in the Bible. He always seemed to feel I would lose interest in him and not have

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

respect for his opinions. He claimed I tried to force religion on him. But that's not true. He has the right to his own opinions. He claimed I was always going to meetings, reading the Bible, and talking with people about the Bible. You know, it's true that my religious activities occupied more of my time, but I feel I was balanced.

**Q:** And what do you mean, you felt you were balanced?

**A:** As one of Jehovah's Witnesses, I learned that I had to be balanced in caring for the needs of my family. I really tried to be a better wife by showing him more kindness and love. I tried to have the house cleaned and food on the table when I attended my meetings. I didn't neglect him as he claims, but rather, I improved. Unfortunately, it seemed that the harder I tried to be a better wife, the worse he got. It seemed that my being a better person was overshadowed by being one of Jehovah's Witnesses. I don't want to give you the impression I was perfect. I made my mistakes. But I really feel I tried.

And I don't want to sound like he's all bad. In fact, he was a very good provider. Around the house he was very helpful in fixing and repairing things. You know, underneath his critical feelings about my religious beliefs, I always felt that he was very sensitive but he just couldn't show it. I don't love him anymore. But I do feel compassion for him. I'm really angry and hurt that he would try to get back at me by taking my Lisa and saying I'm a religious fanatic. You know, doctor, I really think there's more to it than just the religion.

A court will be interested in examining your religious beliefs. A popular issue raised when one mate is not one of Jehovah's Witnesses is the fact that Jehovah's Witnesses do not celebrate holidays like Christmas and birthdays. You must be prepared to respond to this issue in an honest and direct manner. The psychologist will want to know whether your children are actually damaged or hindered by your religious convictions. This

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

presents a fine opportunity for you to show that your religious beliefs are not detrimental to your child's well-being. Rather, when viewed in the proper perspective, comparing the love and affection you offer your child and the other opportunities for enjoyable times as a family, the lack of celebration of holidays such as Christmas and birthdays poses no serious threat to the child's well-being.

**Q:** I noticed from the report your spouse claims you don't allow your child to celebrate holidays like Christmas and birthdays.

**A:** That's true. We don't participate in these holidays because they're not accurately based on the Bible. For example, Christ was not born on December 25, but in the fall of the year. When viewed realistically, how could there have been shepherds in the fields in the wintertime? We believe that our children should not be told that Santa Claus exists when it's just not true. You know, I'm aware that my child might feel left out, so I make an extra effort to compensate for not celebrating Christmas. I'm not opposed to giving gifts; in fact, I regularly give gifts to Lisa all year round. And more important than material things, I feel that I show Lisa a lot of love. I try to build a really close relationship with her by spending a lot of time with her. You know, doctor, my ex-husband claims that by not celebrating those holidays our child is going to be psychologically damaged. But if that were really so, what about the millions of Orientals and Africans who also don't celebrate these holidays? I just can't believe that they're going to be psychologically damaged by not celebrating Christmas.

**Q:** Yes, that's true. You mentioned that you try to show extra interest and love to Lisa. Can you elaborate on what you do?

**A:** There are many times when we just sit and talk. Lisa likes to come in after school and discuss her day with me. When she brings home a school project that she's really proud of, I try to stop what I'm doing and praise her. I also like to include her in

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

some of the household duties like cooking, sewing, and things like that. It gives me an opportunity to teach her things. I really enjoy being with her. Also, I really try to build her self-esteem and encourage her in her artwork. You know, she really has potential. Sometimes she gets discouraged because she wants to do better. So I encourage her.

**Q:** Yes. Very interesting. Is there anything else?

**A:** Well, that's about it. Wait—there is one more thing. I do spend time studying the Bible with her. I feel it's important that she learn something about Jehovah God.

**Q:** And what do you teach your child in these Bible studies?

**A:** I try to teach her about some fundamental principles like honesty and why it is important. Also, we study about showing love to others, being kind, forgiving, and things like that.

Above all, the mental health care professional will want to know what type of relationship you have with your child. You want to communicate the fact that your religious beliefs have helped you to become a better parent. You will want to show that a Christian parent is capable of providing for the emotional and physical needs of the child, as well as the child's spiritual needs. Take the opportunity to show that a warm, loving bond already exists between you and your child, so that any disruption to this bond will be detrimental to the child.

The mental health care professional who is conducting the interview may know very little about the religious teachings and practices of Jehovah's Witnesses. Therefore, you will want to use language and illustrations that will help the examiner to clearly understand the lifestyle of a Christian. You will want to present yourself as one who follows the teachings of the Scriptures, not as one who is dogmatic and a slave to rules. By reasoning, help the examiner to see that the course you have selected is a course of wisdom and

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

reason. The following dialogue is an example of how you might explain the fact that Christians attend five Bible-based meetings each week and are encouraged to devote additional time for personal Bible study:

A: Well, Lisa generally comes with me. Our meetings are much like a classroom. We usually have someone giving a reading, a discussion about a Bible topic. We encourage all, young and old, to learn to really reason and think about a matter. Rather than just telling Lisa what to think, I encourage her to use her mind. As one of Jehovah's Witnesses, I feel that the Bible encourages us to use our God-given conscience.

Q: Can you give me an example of that?

A: Yes. You know God tells us to show love and kindness. Let's say that Lisa is out playing ball with another child, and she takes something that is not hers. I would reason with her about it, helping her to understand why it is wrong, rather than just punishing her or demanding that she be honest. It may sound simple, but as a parent, you know it is a very difficult process. I try my best.

Q: Okay. And how often do you go to these meetings?

A: We have five hours of meetings a week. To some, that may sound like a lot. But it's about the same number of hours a student would spend in one class at school a week. It's a relatively small number of hours if you think that there are 168 hours in a week. It's actually less than three percent.

Like holidays and the celebration of Christmas, Jehovah's Witnesses' position on the use of blood is controversial and is often raised as an issue of contention by an unbelieving mate. You want reasonably to stress the fact that you are not opposed to medical treatment. Rather, as a sound, thinking person, you desire to have medical treatment for your minor child in the event of a medical crisis. However, because of the Scriptural admonition regarding blood, and the many serious medical dangers associated with blood transfusions, you

## PREPARATION FOR PSYCHOLOGICAL OR PSYCHIATRIC EVALUATION

want to show your reasonableness in the fact that you have already investigated medical alternatives to the use of blood. You should be prepared to talk about these alternatives in some detail, showing that you are capable and prepared to care for the child's physical needs:

**Q:** As one of Jehovah's Witnesses you don't believe in blood transfusions, do you?

**A:** That's true. Our position on blood transfusions is primarily a religious one, but we also know there are many medical dangers from blood. We take our position on this issue from various scriptural references, such as Acts 15:28, 29 and Leviticus 17:13, 14. These scriptures point out that we should avoid the use of blood in our bodies. I'm sure you, as a doctor, are already aware of the potential medical complications that can arise from blood transfusions, such as hepatitis and AIDS. Because of our stand, some feel that we refuse all medical treatment. But this is just not true. We fully utilize medical doctors. In the area of transfusions, we do accept non-blood volume expanders such as saline solution, Ringer's lactate, dextran, etc. Perhaps you'd like to read about the medical aspects of our stand. I have a copy of an article that appeared in *The Journal of the American Medical Association* on this question of Jehovah's Witnesses and blood transfusions. (Reproduced in the *Awake!* of June 22, 1982, pages 25-27.)

Doctor, you might be reassured to know that I have made medical provisions to ensure that Lisa will receive proper medical attention if and when she needs it. For example, I have a doctor who has agreed to respect our views on blood. Also, if an emergency should arise, I've made arrangements to have my child transported to a hospital with doctors that specialize in surgery on Jehovah's Witnesses.

**Q:** Thank you. That was very interesting. I'll take the article. To be honest with you, I don't know if I'll have time to read it. But I'll certainly try.