ADVANCED CHILD SUPPORT: REBUTTALS

OREGON STATE BAR FAMILY LAW SECTION
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I. Rebuttal Authority

A. Family Support Act of 1988 – 42 U.S.C. §667. Congress enacted the Family Support Act in 1988 with the goal of increasing amounts of child support collected by making guidelines mandatory and removing differences between states. Linda Henry Elrod, *The Federalization of Child Support Guidelines*, 6 J. Am. Acad. Matrim. Law. 103, 124 (1990). The Act required that each State establish guidelines for child support amounts within the State. 42 U.S. Code §667(a). The Act went one step further, however, and provided that:

> "*There shall be a rebuttable presumption, in any judicial or administrative proceeding for the award of child support, that the amount of the award which would result from the application of such guidelines is the correct amount of child support to be awarded. A written finding or specific finding on the record that the application of the guidelines would be unjust or inappropriate in a particular case, as determined under criteria established by the State, shall be sufficient to rebut the presumption in that case.*" 42 U.S. Code §667(b)(2).

B. Oregon Revised Statute (ORS). A variety of statutes set forth the framework for establishment of child support awards in the State of Oregon. The court has authority to enter awards of support in a variety of cases, including, but not limited to:

ORS 107.105	Authorizes entry of an order for child support in a judgment of dissolution, annulment or separation.
ORS 108.110 - ORS 108.120	Authorizes entry of an order for child support *during* marriage.
ORS 109.010	Authorizes a child (no age limitation) to seek support from the child's parents if the child is poor and unable to provide for him or herself.
ORS 109.103	Authorizes entry of an order for child support as between unmarried parents.

Regardless of the type of case in which support may be ordered, however, the court must base each such award upon specific statutory criteria set forth in ORS 25.270, et seq (e.g., each parent's income, the child's needs, etc.). In response to the federal requirements for state guidelines, the State of Oregon enacted ORS 25.270, et seq., which collectively set forth the criteria for establishing an award of child support within the state. This particular statutory scheme is defined as an "income shares model," which reflects the belief that a child of divorced or unmarried parents should receive the same proportion of parental income

as the child would have received if the family were not divided. Elrod at 119-120. That model is codified in ORS 25.275(2), which provides:

> "*(a) The child is entitled to benefit from the income of both parents to the same extent that the child would have benefited had the family unit remained intact or if there had been an intact family unit consisting of both parents and the child.*
>
> *(b) Both parents should share in the costs of supporting the child in the same proportion as each parent's income bears to the combined income of both parents.*"

In addition to creating guidelines and criteria for use in determining an appropriate amount for a child support award, the State of Oregon, in accordance with Federal requirements, permits for rebuttals in appropriate cases. Indeed, ORS 25.280 provides that:

> "*[T]he amount of support determined by the formula established under ORS 25.275 is presumed to be the correct amount of the obligation. This is a rebuttable presumption and a written finding or a specific finding on the record that the application of the formula would be unjust or inappropriate in a particular case is sufficient to rebut the presumption.*"

The statute goes on to set forth ten specific criteria the court is authorized to consider in making a finding as to whether the presumed amount of support ought to be rebutted, which are:

> "*(1) Evidence of the other available resources of a parent;*
>
> *(2) The reasonable necessities of a parent;*
>
> *(3) The net income of a parent remaining after withholdings required by law or as a condition of employment;*
>
> *(4) A parent's ability to borrow;*
>
> *(5) The number and needs of other dependents of a parent;*
>
> *(6) The special hardships of a parent including, but not limited to, any medical circumstances of a parent affecting the parent's ability to pay child support;*
>
> *(7) The needs of the child;*
>
> *(8) The desirability of the custodial parent remaining in the home as*

a full-time parent and homemaker;

(9) The tax consequences, if any, to both parents resulting from spousal support awarded and determination of which parent will name the child as a dependent; and

(10) The financial advantage afforded a parent's household by the income of a spouse or another person with whom the parent lives in a relationship similar to husband and wife." ORS 25.280

C. Oregon Administrative Rule (OAR). In addition to the rebuttal criteria specifically identified in ORS 25.280, the Division of Child Support (DCS) of the Department of Justice has authority to establish by rule additional rebuttal criteria. OAR137-050-0760 provides a list of seventeen specific rebuttal factors and criteria, but that rule makes clear the delineated criteria are a ***non-exclusive*** list of factors to consider when working with rebuttals.

The specific rebuttal factors set forth in OAR 137-050-0760, include:

"*(1) Evidence of the other available resources of the parent;*

(2) The reasonable necessities of the parent;

(3) The net income of the parent remaining after withholding required by law or as a condition of employment;

(4) A parent's ability to borrow;

(5) The number and needs of other dependents of a parent;

(6) The special hardships of a parent affecting the parent's ability to pay support, including, but not limited to, any medical circumstances, extraordinary travel costs related to the exercise of parenting time, or requirements of a reunification plan if the child is in state-financed care;

(7) The desirability of the custodial parent remaining in the home as a full-time parent or working less than full-time to fulfill the role of parent and homemaker;

(8) The tax consequences, if any, to both parents resulting from spousal support awarded, the determination of which parent will name the child as a dependent, child tax credits, or the earned income tax credit received by either parent;

(9) The financial advantage afforded a parent's household by the income of a spouse or domestic partner;

(10) The financial advantage afforded a parent's household by benefits of employment including, but not limited to, those provided by a family owned corporation or self-employment, such as housing, food, clothing, health benefits and the like, but only if unable to include those benefits as income under OAR 137-050-0715;

(11) Evidence that a child who is subject to the support order is not living with either parent;

(12) Findings in a judgment, order, decree or settlement agreement that the existing support award is or was made in consideration of other property, debt or financial awards, and those findings remain relevant;

(13) The net income of the parent remaining after payment of mutually incurred financial obligations;

(14) The tax advantage or adverse tax effect of a parent's income or benefits;

(15) The extraordinary or diminished needs of the child, except:

(a) Expenses for extracurricular activities and

(b) Social Security benefits paid to a child because of a child's disability;

(16) The return of capital.

(17) The financial costs of supporting a Child Attending School at school, including room, board, tuition and fees, and discretionary expenses, the ability of the Child Attending School to meet those expenses with scholarships, grants and loans, and the ability of a parent to provide support for the Child Attending School, either in kind where a child continues to live in a parent's home or with cash if there are parental resources to provide financial support over and above the amount for a Child Attending School generated by the child support calculator."

D. Case Law. The Court of Appeals of Oregon affirmed in *Petersen and Petersen* the concept that neither statutory nor rule-based rebuttal criteria are designed to be exclusive lists. 132 Or App 190 (1994). In *Petersen*, the parties had signed a property settlement agreement in advance of their ultimate divorce that provided for agreed-upon child support in the amount of $1,000. In the subsequent divorce proceeding, the wife sought to enforce

the $1,000 support obligation, whereas the husband argued the trial court should not adopt the terms of the agreement because those terms were inequitable and also that he had been unaware of the extent of the marital debt when he initially made the agreement. *Id.* at 192.

The trial court acknowledged the husband's $1,000 support obligation was a significant upward deviation from the presumptive support amount calculated in accordance with statutory directives in the following finding of fact:

> "*The child support guidelines presume that the total child support amount in this action is $642.84. However, pursuant to ORS 25.280, the court determines that amount to be unjust or inappropriate, and the presumption of its correctness is rebutted because the parties entered into a Property Settlement Agreement wherein [wife] and [husband] both agreed that [husband] was able to and was willing to pay the increased amount. In consideration of this circumstance, [husband] is ordered to pay monthly child support of $1,000." Id.* at 192-93.

The husband subsequently assigned error to the child support award by arguing that the trial court had no authority to depart from the presumptively correct child support amount because the child support guidelines allow a rebuttal only where one of the ten rebuttal factors listed in ORS 25.280 is present. The husband suggested that the trial court had overstepped its bounds by relying on such an agreement because the parties' prior agreement was not one of the statutory rebuttal factors. *Id.* at 193-94.

The Court of Appeals ultimately upheld the trial court's rebuttal and upward deviation of the presumptive support amount on the basis that nowhere in ORS 25.280 is there language seeking to make the listed criteria exclusive. *Id.* A spirited dissent by Justice Landau suggests that the statutory language is clear and unambiguous in setting forth ten specific factors to consider as rebuttal criteria. Justice Landau went on to state that the absence of language stating the statutory criteria are exclusive does not, in fact, make them non-exclusive. Justice De Muniz and Judge Haselton joined in the dissent. *Id.* at 206.

The *Petersen* court discussed the statutory requirements for rebutting the proposed child support in some detail and concluded that "the only finding that the statute requires to be in writing or on the record is the finding that the presumed amount is 'unjust' or 'inappropriate.'" *Id.* at 202. That finding, however, must be based on economic factors that are relevant to the needs and the best interests of the children. *Id.* at 200.

Practice Tip #1

Findings of fact are critical in rebuttal cases. Make a distinction between rebuttals in stipulated judgments versus those deriving from contested hearings and trials. A stipulated rebuttal might require little more than an agreement that the presumptive guideline child support amount is unjust and inappropriate in light of "the other agreements of the parties." Indeed, in many cases the parties may simply agree on a specific support amount, without identifying any particular reason for the deviation. This may be a result of the fact that the parties have differing ideas as to why the support amount should deviate from the guideline calculation, or it could simply be a product of both parties having an equitable result in mind for their particular case.

Sample Finding of Fact - Stipulated (Use With Caution)

4.8 The presumptive amount of support determined in accordance with OAR 137-050-0710 is $_____ per month. The presumptive amount is unjust and inappropriate because of the agreements between the parties. The parties agree a just and proper amount of child support is $_____ per month. The presumptive child support calculation is attached to this judgment as required by UTCR 8.060.

In litigated cases, however, practitioners are well advised to strictly follow the requirements set forth in OAR 137-050-0760 and include "a finding that sets out the presumed amount, concludes that it is unjust or inappropriate, and sets forth a different amount **and a reason it should be ordered**." Emphasis added.

Sample Finding of Fact - Litigated

4.8 The presumptive amount of support determined in accordance with OAR 137-050-0710 is $_____ per month. The presumptive child support calculation is attached to this judgment as required by UTCR 8.060. The presumptive amount is unjust and inappropriate because Father enjoys a significant financial advantage on account of his being self-employed. Father incurs monthly expenses in the amount of $1,000 through his business that are more appropriately considered personal in nature, but are not includeable as income under OAR 137-050-0715. Father would need to earn $1,200 additional gross income each month in order to have $1,000 net funds available for his personal use. A child support calculation is attached to this judgment and marked as Exhibit 2 that demonstrates what the presumptive child support calculation would be if Father's gross income was $1,200 higher per month than it is. Therefore, a just and proper amount of child support is $_____ per month.

Regardless of the procedural posture of the case (i.e., stipulated agreement versus a litigated result), practitioners should take appropriate steps to protect their clients against future modifications. Recognize that an administrative modification taking place 36 months in the future may increase the obligee's child support, but may not make any change to cost-sharing requirements set forth in the judgment. If the obligor is required by the underlying judgment to cover 100% of the significant transportation costs, but is afforded a lower support obligation to offset those costs, it would be inequitable for the obligee to modify the bottom line support amount administratively without making a concurrent change to the other cost-sharing arrangements. If the judgment is stipulated between the parties, consider including the following language in the judgment:

Waiver of Administrative Modification (stipulated judgments only)

Finding of Fact

4.8 The parties agree that any future modification of child support is properly brought in the circuit court, rather than in an administrative proceeding because an automatic recalculation would not necessarily account for the rebuttal factors set forth herein. The parties each expressly waive any right they might have to initiate or request an administrative modification of child support pursuant to ORS 25.020 and ORS 25.287.

Order Section

3.5.4 **Administrative Review.** Each party expressly waives that party's right to an administrative calculation of child support pursuant to ORS 25.020 and ORS 25.287.

Waiver of the right to an administrative proceeding is consistent with the Oregon Supreme Court's decision in *Matar and Harake,* 353 OR 446 (2013). The *Matar* court affirmed that the parties ***may not*** deprive a court of its statutory authority, but they ***may*** freely waive their own rights to seek the court's exercise of such authority. *Id.* at 460. The limitation on such waivers is that a parent's waiver of his or her right to seek modification cannot affect either the child's right to seek an appropriate level of child support or the state's authority to act on the child's behalf. *Id.* at 461. Using the suggested language binds the hands of neither the child nor the state in bringing an action before either an administrative body or the court itself to determine an appropriate support award. In fact, the parents themselves are not wholly waiving their rights to a modification (which is permissible per *Matar*), and are instead simply waiving their rights to one of the avenues through which a future modification might be accomplished.

Waivers are, of course, limited to voluntary agreements. That limitation means if the judgment is the product of a contested trial, a wise practitioner will request findings of fact and orders consistent with the concept that a future administrative proceeding may not preserve the types of creative solutions included by the court in achieving "just and proper" results. In a litigated judgment,

consider automatic termination of creative cost-sharing provisions if the child support award is subsequently modified. For example:

Automatic Termination of Cost-Sharing Provisions

Finding of Fact

4.8 The presumptive amount of support determined in accordance with OAR 137-050-0710 is $_____ per month. The presumptive child support calculation is attached to this judgment as required by UTCR 8.060. The presumptive amount is unjust and inappropriate because of the travel expenses associated with the long distance parenting plan. The court expects Father will spend an average of $400 per month on transportation costs (primarily in the form of airfare) associated with his parenting time. Therefore, a just and proper amount of child support is $_____ per month.

Order Section

4.5 **Transportation Costs (Parenting Time).** Father shall be responsible for 100% of the airfare cost in connection with his regularly scheduled parenting time. This includes the child's airfare to fly to and from Father's residence or Father's airfare to fly to and from the area surrounding Mother's residence. This provision shall automatically cease to be of any force or effect in the event of any subsequent modification or recalculation of the child support provisions contained herein. Upon any such modification or recalculation, and absent any order from the court or administrative agency to the contrary, each parent shall then be responsible for one-half of the transportation costs (including airfare) in connection with Father's regularly scheduled parenting time.

II. Case Law Trends. A variety of appellate decisions passed down in the wake of *Petersen* have addressed rebuttal criteria. A sampling of those cases and the relevant holdings in each includes:

A. *Larkin and Larkin*, 146 Or App 310 (1997). Factors that are determinative in the guideline calculation itself (e.g., income disparity) are not appropriate rebuttal factors. Joint *legal* custody is another factor that is inappropriate to consider as rebuttal criteria because it is not an economic factor relevant to the needs of the dependent child. Contrast this with the inclusion of joint *physical* custody (i.e., parenting time) as a determinative factor in the guideline computation.

B. ***Redler and Redler*, 330 Or 51 (2000).** The party seeking to rebut the presumptively correct child support amount has the burden of providing evidence that would support a finding that it would be unjust or inappropriate to apply the statutory formula in establishing the appropriate support obligation. In *Redler*, the father sought to rebut the guideline amount by introducing evidence that the parties' two minor children (who were primarily living with the mother) had income of their own from gainful employment (i.e., a newspaper route). The trial court refused to consider the children's individual income as a rebuttal factor. The Supreme Court ultimately upheld that decision, finding that the father had failed to introduce any evidence that his children's income diminished their need for support from him.

C. ***Halpert and Halpert*, 157 Or App 276 (1998).** Child support should be based on each parent's gross income, which includes "income from any source." This is distinct from a parent's gross *taxable* income, which might exclude items such as voluntary retirement contributions (e.g., pre-tax 401(k) contributions). The court ***must*** include all sources of income for purposes of calculating the presumptive amount of child support, but ***may*** separately consider tax factors as rebuttal criteria.

D. ***McMurchie and McMurchie*, 256 Or App 712 (2013).** It is legal error to include both actual ***and*** presumed income in a parent's gross income when calculating the presumptive child support amount. The calculation must include actual income if a parent is employed on a full-time basis at or above the state minimum wage, is unable to work due to a verified disability, is a recipient of worker's compensation benefits, or is incarcerated. A potential income figure must be utilized if a parent is unemployed, is employed on a less-than-full-time basis, has an actual income less than minimum wage for full-time employment in Oregon, or lacks any direct evidence of income.

The father in *McMurchie* was unemployed, but he and his current wife received approximately $40,000/year in interest from invested lottery winnings. The trial court erred by utilizing a gross income figure for the father that included both his potential full-time minimum wage income and one-half of the annual interest he and his wife earned on their investments. Because the father was unemployed, the correct approach was to calculate the presumptive support amount based on potential income and then make a determination as to whether deviation was appropriate by utilizing interest income as a rebuttal factor.

One-time, unanticipated windfalls such as lottery winnings are appropriately considered as a parent's income in the year those funds are received. Thereafter, the court may consider leftover funds as "other available resources of the parent." OAR 137-050-0760(1).

Note, however, that in discussing the "Return of capital" rebuttal criteria, the drafters of the rule commented that it is generally not "intended that an obligated parent should be required to spend down an asset in order to pay support." 2014 Guidelines Commentary.

Practice Tip #2

Interest on investments may be appropriately included in a parent's *actual income* if the parent is employed on a full-time basis at or above the state minimum wage, is unable to work due to a verified disability, is a recipient of worker's compensation benefits, or is incarcerated. For example:

Scenario A

Joe Johnson receives $2,000/month in worker's compensation benefits. Additionally, Joe receives $4,000/month in interest as a beneficiary of a well-funded Trust. For child support purposes, it is appropriate to perform a guideline computation based on Joe's gross *actual* income of $6,000/month.

Scenario B

Joe Johnson is unemployed, but the evidence at trial demonstrates he could earn $2,000/month working full-time. Joe does not work because he receives $4,000/month in interest as a beneficiary of a well-funded Trust. For child support purposes, it is appropriate to perform a guideline computation based on Joe's *potential* income of $2,000/month, and then separately consider the $4,000/month of interest income as a rebuttal factor.

In Scenario B, the careful practitioner will attach a child support calculator to the judgment as required by UTCR 8.060 that includes gross income of only $2,000 for Mr. Johnson. Consider preparing a second worksheet, however, as a trial exhibit (or even as a second exhibit to attach to the judgment and then reference it in a rebuttal finding of fact) so the court has an idea what the presumptive amount might look like if Mr. Johnson's actual income was $6,000/month.

Many of the rebuttal cases remanded to trial courts are not sent back because the trial court utilized incorrect logic, but rather because the trial court did not follow the correct technical steps in getting where it wanted to go.

E. ***Hardiman and Hardiman*, 133 Or App 112 (1995).** It is legal error to consider the income of a parent's new partner in calculating the *presumptive* child support obligation. When calculating gross incomes pursuant to the guidelines, the only appropriate items to include are the parents' incomes and, in some cases, their potential incomes.

Practice Tip #3

The financial advantage afforded a parent's household by the income of a spouse or domestic partner is an appropriate rebuttal criteria. *See* OAR 137-050-0760(9). The trial court in *Hardiman* erred by

including such income in each parent's gross income for purposes of computing the presumptive amount. The court should have instead calculated the presumptive amount utilizing each of the parents' gross incomes and then used the new partners' incomes to deviate from the guideline amount. Again, the remand on appeal was due to a technical issue in how the court computed support, rather than any issue with the logic behind utilizing a new spouse's income as part of the overall "just and proper" analysis.

- A new spouse's income is relevant in determining what is "just and proper" support. *Dawson and Dawson*, 52 Or App 345, 351 (1981); *Ainsworth and Ainsworth*, 114 Or App 311, 314-15 (1992); *Hardiman and Hardiman*, 133 Or App 112, 113 (1995).

- It is not necessary that the new spouse earn a high wage in order to consider it in the child support analysis. See *Dawson* at 351 (New spouse had combined monthly income of $2,160); and *Ainsworth* at 314 (New spouse had historically worked part time as a waitress, earning between $800 and $1,600 per month, but at the time of trial had monthly income of $357).

F. ***Pedroza and Pedroza*, 128 Or App 102 (1994).** OAR 137-050-0760(2) sets forth as one of the appropriate enumerated rebuttal criteria the "reasonable necessities of the parent." The father in *Pedroza* argued that his monthly expenses (including a $369 car payment, $616 in combined credit card payments, and an optional retirement fund contribution of $340) were appropriate rebuttal criteria to consider in deviating from the presumed child support amount and lowering his obligation. The *Pedroza* court disagreed and ruled that discretionary expenses generally do not qualify as reasonable necessities. Particularly noteworthy for the court were the facts that the father had not contacted his creditors in an effort to reduce his monthly consumer debt payments, had not attempted to refinance the loan obligation on his vehicle, nor had he taken any steps to (or even considered) reduce the amount of his voluntary retirement fund payment.

Practice Tip #4

Contrast consumer obligations that were mutually incurred by the parents, versus those a parent incurred individually. OAR 137-050-0760(13) specifically includes as a rebuttal factor "the net income of the parent remaining after payment of ***mutually incurred financial obligations***." Emphasis added. Be aware, however, that the *Pedroza* court rejected the father's argument that his outstanding $14,000 consumer debt was essentially a joint debt because he had left all of the household furnishings with the mother when they separated and he subsequently needed to purchase replacement furnishings and basic necessities for his new residence.

If your client is seeking a rebuttal based on significant consumer obligations, consider presenting the following types of evidence:

- Demonstrate the debt was mutually incurred *during the relationship*. There is no distinction in the rules between married and unmarried parents, so while debt division may not be an issue in your ORS Chapter 109 proceeding (i.e., custody, parenting time, child support), it may be appropriate to demonstrate one of the parties used an individual credit card as a joint resource and then request a deviation in guideline child support.

- Demonstrate the efforts your client has made to free up additional resources. For example, has he attempted to consolidate his debts? Did she apply for a refinance? Did he cancel his cable tv package? Did she request a lower interest rate from her credit card company? Do his credit card statements establish that he no longer goes out every Tuesday night to shoot pool at Mo's? Courts are much more likely to accept your client's argument that a deviation in guideline support is appropriate if the client is doing everything in his power to maximize his available dollars. Why should the court do for your client what she is unwilling to do for herself?

Be cautious, however, because consumer debt obligations work both ways. In *Howell and Hooyman*, the court found it appropriate to deviate upwards from the presumed amount of child support when the obligor filed bankruptcy because in doing so the obligee discharged an equalizing judgment and forced the obligee to pay a number of debts, including a sizable amount of attorney fees the obligor had been ordered to pay on the obligee's behalf. 171 Or App 545 (2000).

G. ***Cain and Gilbert*, 196 Or App 28 (2004).** The following factors are ***not appropriate*** to consider as rebuttal criteria:

1. **Actual or potential income.** These are determinative factors in the guideline computation itself.

2. **Payment of past child support.** This is neither an enumerated factor set forth in either statute or rule, nor is it an ecomonic factor that relates to the needs of the parties' child.

3. **Public policy considerations.** The trial court in *Cain* made a specific finding that it would establish poor public policy if a parent who had legal custody of a child was required to pay child support to the noncustodial parent. The Court of Appeals rejected use of this factor because it is not enumerated and it is noneconomic. The court went on to point out that the guideline rules specifically provide for payment of child support to a parent who has shared *physical* custody regardless of whether the parent also has *legal* custody.

III. Hypothetical Rebuttals.

Refer to slides.

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Education

- J.D., Willamette University College of Law, Salem, Oregon, 2009
- B.A., Willamette University, Salem, Oregon, 2004, Major: Theatre

Associations

- Oregon State Bar, Family Law Section
- Oregon Academy of Family Law Practitioners
- Oregon State Bar, Alternative Dispute Resolution Section

Leadership *(selected)*

- *Member*, State Family Law Advisory Committee, (2013-present, appointed by Chief Justice Thomas Balmer in December 2013)
- *Chair*, Oregon State Bar, Family Law Section, Legislative Subcommittee (2012-present; served as Co-Chair 2010-2012)
- *Member*, Oregon State Bar, OSB/OJD Task Force on Oregon eCourt Implementation (2013-present)
- *Membe*r, Oregon State Bar, Senate Bill 799 Task Force (2013-14)
- *Judges Panel*, American Bar Association, Law Student Division Region 10 Negotiation Competition (2010)
- *Board Member*, Historic Elsinore Theatre (2012-present)
- *Board Member*, Rotary Club of South Salem (2011-present)

Awards

- Rising Star, Super Lawyers Magazine (2012-14)
- Top 10 Family Law Attorneys Under 40 - Oregon, Nat'l Academy of Family Law Attorneys (2014)
- New Lawyer of the Year, Marion-Polk County Legal Aid (2010)

Publications

- *2013 Oregon Legislation Highlights (Family Law)*, Oregon State Bar CLE publication
- *2011 Oregon Legislation Highlights (Family Law)*, Oregon State Bar CLE publication

Speaking Engagements *(selected)*

- *2013 Oregon Legislation Highlights*, Oregon State Bar, Family Law Section CLE (2013)
- *Oregon Legislative Updates (Family Law)*, Polk Co. Mediators Assoc. (2012)
- *Spousal Support Reform*, Multnomah Co. Family Law Group (2012)
- *Family Law Practice Panel*, Willamette University College of Law (2011-2013)
- *2011 Oregon Legislation Highlights*, Oregon State Bar, Family Law Section CLE (2011)