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CONTENTIOUS DIVORCE: THE ROCKY PATH TO THE CHILD'S BEST INTERESTS

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I. INTRODUCTION

Defining the best interests of the child sounds deceptively easy. All of us have seen a happy, thriving child relating to loving parents. There is an ease of attachment evident in each person's eyes and a gentle dance of touch and kindness. Yet despite libraries dedicated to quantifying intelligence, behavior, and psychiatric disorders, no article or study was found that clearly defines criteria used by courts to make custody decisions and how those criteria relate to future outcome. The data does not exist for routine, much less for contentious divorces. Why is there no research to guide us? We have no methodology that quantifies parameters such as attachment, affection, identity, or intimacy. We have no approach that can take into account the many factors that change year to year and even less so over ten, twenty, or thirty years. We are just beginning to define adult personality and have no good measures of severity of character or personality disorders.

What is clear from many articles is that professionals dedicated to resolving custody issues have a wide range of strongly held feelings about what is best for children based on their own experiences, upbringing, culture, and religious beliefs, as well as professional training. Beyond the evaluator's beliefs and subjectivity a child's needs develop and change over time. What may be in the best interest of a child at age 2 may change at age 7, and again at 12 or 16. Combining the developmental and temporal factors with changing circumstances, siblings, economics, a host of other factors,¹ and finally adding to the mix the fallout of contentious parents, makes applying the "best interest" principle a frustrating task. In this paper we will review the historical roots, developmental theory of the best interest standard, focus on psychological elements that often motivate contentious divorces, and

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1. See Appendix I.

then make some recommendations concerning child custody determination.

II. HISTORICAL PERSPECTIVES

Over the last 500 years, child custody decisions have varied in response to the evolving perspectives of our society, culture, and laws². Despite what we have learned about child development, the concerns reflected in an 1850 treatise still hold today: "the state of the law relating to the custody of the persons of infants is not very satisfactory . . . there prevails an uncertainty in the application of the law, as it exists, to the difficult cases which frequently arise in connection with the disposal of minor children."³

From Ancient Roman through early nineteenth century English common law, the father was given absolute authority over his children since children were defined as property, and the father owned or managed all of the family assets.⁴ In the nineteenth century, the English courts began to assume jurisdiction over the welfare of children under the doctrine of *parens patriae*, that the crown would safeguard those with no other protector.⁵ Percy Shelley was one of the first men in Britain to lose custody of his children in 1817 because of his "vicious and immoral" atheistic beliefs.⁶ In 1839, the Talfourd Act stated that courts could determine custody of infants under 7 years.⁷ Despite these changes, throughout the 1800s there were few exceptions to the doctrine that the father's rights were superior to those of the mother.⁸ In the United States, in 1881, a court in Arkansas held:

It is one of the cardinal principles of nature and of law that, as against strangers, the father, however poor and humble, if able to support the child in his style of life, and of good moral character, cannot, without the most shocking injustice, be deprived of the privilege by any one

2. See John F. McDermott, Jr. et al., *Child Custody Decision Making*, AM. ACAD. OF CHILD PSYCHIATRY 104, 105 (1978).

3. See WILLIAM FORSYTH, A TREATISE ON THE LAW RELATING TO THE CUSTODY OF INFANTS IN CASES OF DIFFERENCE BETWEEN PARENTS OR GUARDIANS (T. & J.W. Johnson 1850).

4. See Andre P. Derdeyn, *Child Custody Contests in Historical Perspective*, 133 AM. J. PSYCHIATRY 1369 (1976).

5. See *id.*

6. See *id.*

7. See *id.*

8. See *id.*

whatever, however brilliant the advantage he may offer. It is not enough to consider the interests of the child alone.⁹

The connection between custody and financial support was explicit in an 1883 case: “[A] father is not liable for the support of his minor child, after the custody of the child has been given to the mother by a decree of this court.”¹⁰

In the late 19th century, a mother’s right to custody was acknowledged with regard to younger children and was known as the “tender years presumption.”¹¹ “The claim of a mother during the early years of an infant’s life to the care of her child is to be preferred to that of the father.”¹² However, the period of maternal care was short and seen as a temporary placement until the child was old enough to be in the father’s custody.¹³

In the early 20th century, the Guardianship of Infants Act in 1925 made the mother and father equal with respect to custody of their children.¹⁴ Courts soon preferred mothers as the custodial parent, particularly for younger children.¹⁵ The increasing rights of women, economic capability and the prevailing understanding of child development supported this trend favoring women as custodial parents.¹⁶ By the 1960s, mothers were awarded custody in 90% of contested cases with the father typically required to provide financial support.¹⁷

Some of the strength of the women’s movement “paradoxically weakened the maternal advantage regarding custody.”¹⁸ A larger percentage of mothers were working out of the home facilitated by the increasing use of day care.¹⁹ A trend toward balancing the rights of both parents, and prioritizing the child’s well being led to “the best interest” principle,²⁰ a phrase coined by Justice Benjamin Cardozo in 1925. The

9. *Verser v. Ford*, 37 Ark. 27 (1881).

10. *Brow v. Brightman*, 136 Mass. 187 (1883).

11. See Barbara J. Fidler et al., *Joint Custody: Historical, Legal, and Clinical Perspectives with Emphasis on the Situation in Canada*, 34 CAN. J. PSYCHIATRY 561 (1989).

12. *Commonwealth ex rel. Hart v. Hart*, 14 Pa. C. 352, 357 (1880) (quoted in Derdeyn, *supra* note 4, at 1371).

13. See Derdeyn, *supra* note 4, at 1371.

14. See Derdeyn, *supra* note 4, at 1369.

15. See Derdeyn, *supra* note 4, at 1371-72.

16. See Derdeyn, *supra* note 4, at 1372.

17. See Derdeyn, *supra* note 4, at 1372.

18. Andre P. Derdeyn & Elizabeth Scott, *Joint Custody: A Critical Analysis and Appraisal*, 54 AM. J. ORTHOPSYCHIATRY 199, 200 (1984).

19. See *id.*

20. See *id.*

Uniform Marriage and Divorce Act passed in 1974²¹ asked the courts to consider virtually all of the criteria in Table 1.²²

The goal was to favor neither parent, "requir[ing] judges to exercise ever-increasing freedom or discretion in each interpersonal custody decision."²³ Although the "best interests of the child" was the prevailing legal text for custody in all states, courts varied widely in its interpretation and implementation.²⁴

Goldstein, Solnit, and Freud in 1973 published *Beyond the Best Interests of the Child*²⁵ that defined the critical role of the "psychological parent" as the person whose daily relationship with the child provides love, care, and protection. Their guidelines for child placement included:

1. The decision regarding placement must be swift, final and unconditional.
2. Sole custody must be given to one parent.
3. Limit court intervention to only one question: Who among the competing adults should bring up the child?

These distinguished authors saw the severe impact of never-ending discord and hostility; therefore in contentious divorces, Goldstein recommended that "the best interests of the child" standard be superseded by the "least detrimental alternative".

Rather than focusing on "best interest" or "least detrimental," in practice many states have a legislative bias towards joint custody.²⁶ It was hoped that joint custody would reverse a growing trend of paternal abandonment and encourage fathers to both stay involved and maintain financial support of their children.²⁷ Joint legal custody allows the courts latitude "to assure minor children of frequent and continuing contact with both parents [and] to encourage parents to share the rights and responsibilities of child-rearing."²⁸ California was the first state to

21. See McDermott et al., *supra* note 2, at 105.

22. See Appendix I. See also Barbara A. Weiner, *An Overview of Child Custody Laws*, 36 HOSP. & COMMUNITY PSYCHIATRY 838, 839-40 (1985).

23. See Derdeyn, *supra* note 4, at 1374.

24. See *Summary of the Practice Parameters for Child Custody Evaluations*, 36 J. AM. ACAD. CHILD & ADOLESCENT PSYCHIATRY 1784 (1997).

25. See JOSEPH GOLDSTEIN ET AL., *THE BEST INTERESTS OF THE CHILD: THE LEAST DETRIMENTAL ALTERNATIVE* (1996).

26. See Derdeyn & Scott, *supra* note 18, at 201.

27. See Derdeyn & Scott, *supra* note 18, at 201-02.

28. See Derdeyn & Scott, *supra* note 18, at 201 (quoting CAL. CIV. CODE § 4600 (repealed 1994)).

establish a legal presumption in favor of joint legal custody, thus giving judges the power to order joint custody despite the objections of one parent.²⁹ Research suggests there are four major factors to make joint custody successful:

1. Commitment to the arrangement.
2. Flexible sharing of responsibilities.
3. Parents' mutual support.
4. Agreement on the implicit rules of the system.³⁰

Often all of these factors were not in place and instead joint custody was used to avoid facing what seemed to be never ending litigation. Thus joint custody decision may cement rather than resolve chronic hostility and condemn the child to living with two tense, angry parents indefinitely.

At either end of the continuum, decisions are relatively easy. For well-functioning, harmonious, and child-oriented parents, joint physical and legal custody maintains ongoing, frequent contact with both parents and increases financial stability. With a severely impaired parent (*i.e.*, cocaine addiction), sole custody is usually the least detrimental solution. But what to do in contentious divorce when neither parent is functioning optimally? What are the benefits of a best interest standard; what are the risks of not choosing the least detrimental alternative?

III. EPIDEMIOLOGY

“There were an estimated 10,000 divorces in 1867 (0.3 per 1000 population),”³¹ compared with 913,000 divorces (4 per 1000 population) in 1973.³² Currently in the United States about half of marriages end in divorce³³ with annually about one million children experiencing their parents' divorce. About 50-60% of children born in the 1990s will live at some point in single-parent families typically headed by mothers. Approximately 10% of these divorces involve custody litigation.

29. See Steven A. Frankel, *Joint Custody Awards and Children: A Theoretical Framework and Some Practical Considerations*, 48 *PSYCHIATRY* 318, 319 (1985).

30. See Alice Abarbanel, *Shared Parenting After Separation and Divorce: A Study of Joint Custody*, 49 *AM. J. ORTHOPSYCHIATRY* 320, 325 (1979).

31. Derdeyn, *supra* note 4, at 1374.

32. See Derdeyn, *supra* note 4, at 1374.

33. See Virginia A. Sadock, *Relational Problems*, in *COMPREHENSIVE TEXTBOOK OF PSYCHIATRY* 1609 (Harold I. Kaplan & Benjamin J. Sadock eds., 6th ed. 1995).

Most men and women will remarry, but divorces are about 10% more frequent in remarriages and there is about 50% higher rate of divorce in remarriages with children from another marriage. One out of every ten children will experience at least two divorces of their residential parent before turning 16.

IV. THE "BEST INTERESTS" OF THE CHILD: UNDERLYING PRINCIPLES OF ATTACHMENT AND DEVELOPMENT

Attachment is a biological and emotional lifeline rooted in hunger, touch, vision, smell, and in coping with distress or danger. The parent nurtures the hunger, eases the distress, and comforts with gentle holding. The baby begins to trust the world as a safe and benevolent place. As the baby grows into toddlerhood, we see the two year old cling to his parent's knees, scoot off to look at a new toy, then quickly return to "home base." Ideally the parent "matures" along with the child, supporting the child's emerging autonomy while keeping the child safely within age appropriate boundaries: from crossing a street, to choosing after-school activities, and eventually applying for a job or college.

Attachment brings meaning to the communication of values. By responding to the baby's cry the caregiver demonstrates, repeatedly, that the baby is worthy of being heard, cared for, and comforted (the opposite of neglected and the wellspring of self-esteem). Repeated success at comforting shows that caregivers, and eventually the child, can be effective in positively influencing the environment ("something can be done about something").³⁴ Self-esteem, trust, and a sense of efficacy are the core attributes to later healthy personality development, the capacity for attachment to parents, and for intimacy with others in the future. Although early infancy focuses on one caregiver, as the child grows, both parents soon become increasingly relevant to an evolving identity, social role, and values.

Clinical experience with abused and neglected children has demonstrated the consequence of disrupting or distorting attachment. Children who have lost a parent are at higher risk for depression, life-long fear of relationships, and a persistent sense of abandonment.³⁵ Many children who are abused, neglected, or used by a parent suffer

34. See generally Donald Woody Winnicott, *The Depressive Position in Normal Emotional Development*, 28 BRIT. J. MED. PSYCHOL. 262 (1955).

35. See Jane D. McLeod, *Childhood Parental Loss and Adult Depression*, 32 J. HEALTH & SOC. BEHAVIOR 205, 210-14 (1991).

with a low self-esteem, an entrenched sense that the world is not safe, and an impaired capacity for intimacy. Being used by a parent can be overt as in a sexual or criminal use, or more subtle as in a psychological use. Parents use their child to cope, for example, with a sense of loneliness. Instead of allowing the child age-appropriate autonomy, they are over-protective and keep the child as a companion. This over-protection is presented as good parenting, but is motivated by the need to use the child in place of mature, adult relationships. To the child, being used is experienced as being valued not for who you are, but for the purpose you serve. "I am good because I keep my mother company" or "I am valued only when I tell my father the bad things he needs to hear about my mother."

It should not be assumed that children can only make attachments to a psychological parent who is loving, nurturing, and invested in the child. Many abused and used children, dreading real or emotional abandonment, try over and over to make an abusing or using parent love them or work ceaselessly to convince the parent that they are really "good," worthy, and should not be rejected. The child needs to see the parents as good and loving; a used or abused child's clinging supports a distorted form of attachment. This desperate, short-term effort to please an abusive or using parent makes it difficult for judges and trained clinicians to assess the child's genuine wishes and best interests.

V. BEST INTERESTS IN THE FACE OF DISCORD

For most people divorce is experienced as failure. The dissolution of a marriage can be experienced as a personal injury to our dearly held sense that we are smart, in control, and successful at what we do. Regardless of how psychologically healthy the parents may be or how mutual the decision to separate, each spouse feels the grief and loss of their mate, lifestyle, and marital dreams. There are those, who, for reason of upbringing or temperament, are especially vulnerable to these injuries and find the sense of loss intolerable. Inevitably there is anger over these losses and that anger may be magnified and hard to control. Beyond the loss of the marriage itself, losing any status as a parent compounds this "injury." Over months, most divorce-related issues begin to resolve (with sadness replacing some of the anger) by discussion and negotiations, but for some parents each step of the process fuels further rage and bitterness. Often these contentious divorces focus on (1) money, a relatively easy issue to define, quantify, and apportion, and (2) custody which, because it is subjective, can become epic in scale

draining vast emotional and financial resources, sometimes to the point of ruin. As part of warding off massive anger and anxiety, these parents experience an absolute need to get "back on top" and "win."

In some circumstances custody disputes are understandable attempts by an emotionally mature parent to protect a child from the emotional or physical danger of a disingenuous, neglectful, or dangerous parent. However, more often parents rigidly entrenched in a custody battle suffer from character or personality disorders which are defined as a serious, often lifelong distortion in an individual's understanding and approach to inner feelings and to the feelings of others. It is thought that early experiences of unempathic parenting, years of needs not being met, and a biological/temperamental vulnerability combine to create deep feelings of emptiness and rage that are consciously experienced as overwhelming anxiety, depression, anger, and inadequacy. Rather than remembering the many disappointing, angry, and lonely moments of their own early childhood, these parents will feel this anger directed to their divorcing spouse, employer, or attorney, or anxiety. Character disorder will distort relationships so that inner longings, the persistent wish to fulfill early childhood's needs, will dictate the choice of spouse. A need for nurturance may be expressed in marrying a dependent spouse. This spouse's clinging behavior and inability to separate will be initially interpreted as providing companionship and adoration; however, rather than fulfilling expectations of nurturance, soon these dependency needs become a draining demand for constant attention. Rather than "getting," the spouse feels burdened constantly. For individuals with character disorders, losses in later life again trigger unconscious, unbearable anxiety. Since there are few built-in reserves of self-esteem or trust from early childhood, patterns of distortion such as blaming others, dependency, self-importance, or exploitation have to be used to limit overwhelming anxiety and depression. The more meaningful the loss (spouse, child custody), the more rigid and necessary the distortion.³⁶ With the decision to divorce, the wish to regain control and anger offer fertile ground for extended legal battles. The contentious divorce process itself becomes a partial replacement for the loss of the marriage and a distraction from inner, painful feelings. The other spouse's viewpoints or wishes are an anathema to be devalued. Every dollar of expense is another loss. Every hour of custody is worth the most bitter contest. The child who may have been

36. Table 2 lists the major features of character disorder. See Appendix II. Table 3 lists major subtypes. See Appendix III.

used by one or both parents in the marriage now becomes even more relevant as an object or pawn to be used in the divorce. Having lost both parents "to the war," the child is alone and turns to a sibling if available, manifests his or her own anger by provocative misbehavior, or turns inward towards preoccupation and depression to ride out the long storm. The child, now facing the demands of both parents and exposure to constant fighting, may question his or her personal worth, and, if vulnerable, develop defenses in the direction of an incipient personality disorder. In the context of a custody dispute, character-disordered parents cannot "hear" the advice of their attorney, or may be taken advantage of by the attorney's zeal or greed. These ways of coping, by fighting and controlling, are not volitional. The quality and extent of distortion is variable although in its most severe form, character disorders are intractable.

How do we deal with contentious divorces where one or both parents have personality disorders? Where a father is arrogant and exploitative? Where a mother is dependent and has been in the "victim" role throughout the marriage? The father demands joint legal and physical custody as being in the best interests of their 3 and 7 year old children; however, the mother has decided that this is where and when she draws the line. She knows the father has never invested much time in child rearing, and is certain that such a shared arrangement is grounded completely in her husband's need to control and, thus, is detrimental to the children. Each parent is rigidly bound to their position and does everything in their power to undermine the temporary order and their spouse's standing in the eyes of their children and the court. Despite six figure incomes, every dollar for children's clothing or activity fees is used to get more money or custody time. The circumstances vary and are as numerous as the number of contentious divorces. What if a mother is more severely impaired, but the child is quite young and the father may be a critical balance to the mother's use of the child? Each of these parents is willing to spend thousands of dollars, even the child's college fund, in what they have defined as the child's best interests. However, meeting the child's "best interests" may need elements of both parents (because of and despite their distortions), in a mix that changes over time and varies by the child's gender, intellectual needs, age, etc. Maybe neither parent alone will make as good a choice of medical care, religious training, or school programs as both together. Maybe at 15 when facing a difficult decision, a boy will need his father's guidance and approval or his mother's, or a blend of

both. At age 6 he may need the stability of one home being favored in a visitation decision, at age 14, another.

VI. RECOMMENDATIONS

What is a reasonable approach when the guidance of best interests or least detrimental do not easily apply? When the least detrimental is still too detrimental or not sufficiently in the best interests, reasonable people pause and are reluctant to make such potentially adverse, long-term decisions. The core value that makes imposing the least detrimental alternative so attractive is that it sets a structure that largely limits the discord. At least one parent has full legal authority to care for the child. The benefits of ending the discord are felt to outweigh the potential loss of the other parent's positive influence and whatever harm may derive from the custodial parent's personality.

Why is structure so important in contentious divorces and how could it best be achieved using "the best interests" principle? Structure serves as a boundary for the behavior of people with personality disorders. If someone is a dependent personality, without structure, they will continuously search to meet their need and be unable to separate from their child since unconsciously they fear that they will be unbearably lonely and are not secure in the knowledge that they will see their child again. A structure of consistent, reasonably frequent physical visitation, assured telephone access, and guaranteed sanctions for lateness or manipulation of the visitation schedule, if enforced by an accessible authority, is a structure that contains the deep-seated anxiety of loneliness and permanent loss. The parent feels reassured and this core anxiety eases to allow the parent to function with much less need to distort. A similar structure can contain an exploitive, powerful, or arrogant parent by assuring limits on verbal intrusions or abuse as well as any violation of agreements. For the child this structure is designed to optimize the elements each parent offers and to limit those tensions based on personality disorders. A court-appointed guardian ad litem ("GAL") can potentially provide this structure with the following guidelines.

1. Expertise—The family should be assigned to a judge recognized for training and extensive experience in adjudicating contentious divorces. Use of a mental health professional, preferably at the doctoral or child psychiatric level of training, with experience in divorce, treatment of character disorders and child development.

Parallel expertise is required if the court appoints legal counsel for the child;

2. **Consistency**—Continuing the custody team with some limitation on changes (especially rotation of the judge off the case, strategic use of delays, or filing of motions to disrupt the team). Use of regularly scheduled, required status conferences to update the court and, pre-planning (schedules, major decisions) to prevent disputes;
3. **Time**—A developmental time frame that acknowledges the likelihood that the team may need to stay active for several years and be available even longer as circumstances changes. The focus of reviews and recommendations should be the child's optimum functioning and the need for periodic (at least annual) review;
4. **Limited Setting**—A fundamental part of the structure to contain character issues is a limited setting at every level:
 - A. The GAL has to have a detailed understanding of each parent's character to know which demands or criticism are likely grounded in reality or distortion. The GAL's authority, judicial support, consistency, and good judgment regarding detailed limit setting is the structure that allows each parent the opportunity to express their love and parenting unfettered by distortion. The GAL has additional limit setting techniques available including psychological testing and treatment for one or both parents, asking the court to assign costs or set up accessible funds for the child's needs, and altering visitation schedules as needed to protect the child from unreasonable behavior. Especially early in the process, the most structured well intentioned plan will be sabotaged (excuses such as a traffic jam, cell phone problems, plane could not land, etc.). It may be necessary for the GAL to be available within hours or less, reasonable, and fair but firm. Usually limits have to be very rigid in the beginning of the process and can be more reasonable once the team structure has been consistent and in place for a sustained period;
 - B. The lawyers have the difficult task of balancing the parent's appropriate right for legal advocacy with setting limits on tactics or positions that are rooted in characteriological distortions and anger;
 - C. The court has to protect everyone's rights and follow accepted procedures without encouraging motions that are hostile or misguided. The court can use assigning of costs and instructions from the bench to set clear limits. The judge needs to

- have confidence in the GAL, set limits on the parties as necessary, and encourage resolution of any issue as soon as possible. For example, tactics to win economic settlements often spill over into custody or visitation arguments or tensions regarding paying for after-school or summer activities. Every effort should be made to finalize and set clear guidelines on the financial settlement to as soon as possible and thus allow an unencumbered focus on the custody issues;
5. **Cooperation and Respect**—The judge, lawyers, and mental health clinician become a structure that reflects the pre-divorce, marital family and the childhood families of each parent. This team also is known to the child directly through evaluation visits or indirectly through their parents. Thus, the team serves a role-modeling and protective function for the contentious parents and children. Any member of the team may become enmeshed in a distortion that then divides the team. The more anger and confusion, the more attention and time is spent with the parent, the less they have to face the sadness of the losses of spouse and full time parenting. At these moments, the team may be replaying the dynamics of the divorce. Everyone has the responsibility to step back, recall the past reasonableness and experience of the other team members, and restore harmony.

VII. CONCLUSION

Although we have come a long way from considering a child as the father's sole property and responsibility, determining a child's best interest in the storm of a contentious is fraught with risk. No path is obvious or safe. The combined efforts of well intentioned, reasonable, and informed professionals are needed to facilitate the best of what the parents can offer using the structure provided by the court.

APPENDIX I**TABLE 1****MAJOR FACTORS RELEVANT TO CUSTODY DETERMINATION**

- Parental Functioning, Competency, Physical and Mental Health

- Child's Functioning and Needs (child's personality, age, school, activities, family and peer relationships, health needs, child care arrangements, etc.)

- Child's Preference (if possible to discern with reasonable clarity)

- Economic Considerations (Quality of environment, opportunities, etc.)

- Geography (Limits of joint physical custody, practicalities regarding transportation, stability of employment, etc.)

APPENDIX II**TABLE 2****FEATURES OF CHARACTER DISORDERS IN PARENTS**

- **Enduring Distortion of Self-Image (Low, Grandiose)**
- **Difficulty Sustaining Intimacy, Relating to Others**
- **Passivity, Difficulty Initiating or Completing Task**
- **Rigid, Consistent Distorted Perspective of Life Events, Impaired Functioning**
- **All-or-Nothing Approach**
- **Inability to Resolve or Adjust to Loss**

APPENDIX III

TABLE 3*

CHARACTER DISORDER: SUBTYPES

- **Paranoid Personality Disorder** - A pattern of distrust and suspiciousness such that others' motives are interpreted as malevolent
- **Schizoid Personality Disorder** - A pattern of detachment from social relationships and a restricted range of emotional expression
- **Antisocial Personality Disorder** - A pattern of disregard for, and violation of, the rights of others; often aggressive, irresponsible
- **Borderline Personality Disorder** - A pattern of instability in interpersonal relationships, self-image, and affects; and marked impulsivity; marked, intense anger; feelings of emptiness
- **Histrionic Personality Disorder** - A pattern of excessive emotionality and attention seeking; self dramatizing
- **Narcissistic Personality Disorder** - A pattern of grandiosity, need for admiration, and lack of empathy; envious, arrogant, exploitative
- **Dependent Personality Disorder** - A pattern of submissive and clinging behavior related to an excessive need to be taken care of
- **Obsessive-Compulsive Personality Disorder** - A pattern of preoccupation with orderliness, perfectionism, and control

*See AMERICAN PSYCHIATRIC ASSOCIATION: DIAGNOSTIC AND STATISTICAL MANUAL OF MENTAL DISORDERS (DSM-IV) (4th ed. 1994).

