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ILLINOIS STATE BAR ASSOCIATION

Child Law

The newsletter of the Illinois State Bar Association's Section on Child Law

Thoughts from the Chair

By Carol Casey, Chair Child Law Section Council

Practicing child law is as complex as it is rewarding. What was once a cause for legal activists has now become a profession for highly skilled attorneys. The ISBA provides support necessary to develop and maintain the knowledge and skills required to practice in this field.

Our quarterly newsletter, provides insights and practice tips in our area quarterly. You can keep up to date on changes in the law from our case law update in each edition. Editor Terra Howard's commitment really shows in this great resource. You can also keep up to date by reading the ISBA's daily e-clips. If you need to research an issue, check out FASTCase.

We also present CLEs. Last year the committee presented nuts and bolts programs on handling delinquency cases, child welfare cases and appeals. They were taped and can be accessed on the ISBA Web site.

This coming bar year we intend to present more skills based live programs, various taped programs available through FastCLE and collaborate with other committees on their CLEs. One of our long term goals is to develop a destination CLE.

Our greatest resource is our members. If you have a question or insight, post it to our listserve. Our committee members are the experts in our field.

Whether an attorney is newly developing their interest in representing children, or is an experienced expert in the field, the ISBA Childlaw Committee can help you. Please reach out to your colleagues about the benefits of participating in the committee. ■

Retroactivity of child support

By Jon McLaughlin

It is very common to hear an attorney state that child support can be awarded retroactive to the date of filing a petition asking for support, but is this an accurate summation of the law? It most certainly is not. And, quite to the contrary, there are many avenues that can lead to a retroactive award of child support. This article will attempt to present a brief glimpse of a few situations that would allow a retroactive award.

Parentage Cases

The Parentage Act states that "the Court may order any child support payments to be made for a period prior to the commencement of the action." 750 ILCS 45/14(b) (requiring that support be ordered back at least as far as the service of summons). The court has consistently held that an award of retroactive child support is perfectly reasonable, and has extended children's rights to such awards to apply from date of birth to beyond the date of maturity. *Janssen v. Turner*, 292 Ill.App.3d 219 (4th District, 1997); *People ex rel. Greene v. Young*, 367 Ill.App.3d 211 (4th Dist 2006). In addition, when considering retroactive child support to children's birth, 750 ILCS 45/14(b) further specifies that there is a rebuttable presumption that the father's current net income at the time of the order is the same as his prior net income, and the Court should follow this standard.

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Retroactivity of child support

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Divorce Cases

When the original Judgment of Dissolution is silent on the matter of child support, a subsequent child support award may provide for retroactive support. *See Gill v. Gill*, 56 Ill.2d 139 (1973) (where the original proceedings were in rem, the divorce decree reserved jurisdiction to order support, and the court later acquired personal jurisdiction over the payor); *In re Marriage of Cuberly*, 135 Ill. App.3d 55 (5th Dist. 1985) (where the original proceedings were in rem, the divorce decree was completely silent on the issue of child support, and the court later acquired personal jurisdiction over the payor); *cf. Nerini v. Nerini*, 140 Ill.App.3d 848 (2nd Dist. 1986) (retroactive or "equitable" support not allowed where there was personal jurisdiction in the original proceedings, and the court expressly retained jurisdiction over the issue of child support); Conner v. Watkins, 158 Ill.App.3d 759 (4th Dist. 1987). When a court is able to make a retroactive award, once personal jurisdiction of the payor is acquired, there is a rebuttable presumption about his income:

> (4.5) In a proceeding for child support following dissolution of the marriage by a court that lacked personal jurisdiction over the absent spouse, and in which the court is requiring payment of support for the period before the date an order for current support is entered, there is a rebuttable presumption that the supporting party's net income for the prior period was the same as his or her net income at the time the order for current support is entered.

750 ILCS 5/505/(a)(4.5); *see also* 750 ILCS 20/24(3) (governing retroactive awards and presumptions of income under the Revised Uniform Reciprocal Enforcement of Support Act).

In a final decree of divorce, a court may provide for a retroactive child support award in order to make up the difference between what temporary support was paid and what temporary support should have been pursuant to the statutory guidelines. *In re Marriage of Toole*, 273 Ill.App.3d 607 (2nd Dist. 1995) (ordering a retroactive amount of $22,000, as being the difference of the statutory guideline amount and the amount that was paid on a temporary basis).

When There is a Duty to Report Income

The public policy that child-support obligors support their children in accordance with their ability to pay, is supported by the requirement, found in several statutes, for obligors to report changes in their employment and/or income. *e.g.,* 750 ILCS 16/1 *et seq.*; 750 ILCS 45/1 *et seq.*; 750 ILCS 28/45. In fact, the failure to report such changes can be the basis for contempt. *See* 750 ILCS 16/20(f); 750 ILCS 45/15. Courts have made child support modifications retroactive for the reason that the obligors failed to report employment changes. *See People ex rel. Greene v. Young*, 367 Ill.App.3d 211 (4th Dist. 2006) ("our decision is based on our conclusion that it would be 'absurd to believe the legislature intended to permit someone such as [Robert] to disregard direct court orders and thereby to escape his' duty to support his child."); *People ex rel. Williams v. Williams*, 191 Ill.App.3d 311 (4th Dist. 1989). The *Greene* court stated:

> We find it important that it was not Candice's responsibility to continuously bring Robert into court to check on his employment status. To require her to do so would have been inconvenient, expensive, and waste of judicial resources....Both Illinois' public policy and the May 1988 order put the onus on Robert to report a change in his employment status so that he would be required to support his child. Candice alleged Robert failed to report the change in his employment status upon gaining employment. If true, Robert directly disregarded the court's May 1988 order and violated the public policy of this state. We conclude that under these circumstances, a 'circuit court is not statutorily barred from imposing a retroactive child[-]support obligation upon a respondent in an ongoing child[-]support proceeding who, contrary to the court's directive, has failed to inform the court of his having resumed employment'...We recognize that under normal circumstances '[s]upport may be modified only as to installments accruing after the nonmoving party has been notified that a motion to modify has been filed and only upon a showing of a substantial change in circumstances' [citation omitted]. However, the facts of this case are extraordinary. As stated, a circuit court may impose a retroactive child-support obligation upon a respondent in an ongoing child-support proceeding when a respondent has failed to inform the court of his having resumed employment as required by court order.

Greene v. Young, 367 Ill.App.3d 211 (4th Dist. 2006) (quoting *Williams*, 191 Ill.App.3d at 317; *In re Marriage of Zukausky*, 244 Ill. App.3d 614 (2nd Dist. 1993)).

Conclusion

As with a lot of other issues in the law, the possibility of a retroactive child support award is not something that can be summed up in a quick sentence or two, nonchalantly delivered to clients. On the contrary, the correct answer is a quick "maybe," followed up by one question after another question, in an effort to get down the particular facts of the matter so that you can give the client an accurate answer. Hopefully, this short article was able to point out some of the circumstances that should raise red flags when speaking with clients. ■

Post-majority support for education in Illinois

By Jennifer Wood

In Illinois, there exists a unique opportunity for mandated post-secondary support for education available to the children of divorced parents that does not exist for the children of married parents. According to a statutory provision in the Illinois Marriage and Dissolution of Marriage Act, the court may award educational expenses for post-majority children as part of a Marriage Settlement Agreement. 750 ILCS 5/513(a)(2) provides that this parental support may apply to "periods of college education or professional or other training after graduation from high school," or for any high school education that continues after a child turns 19. Although common, this award is not automatic, however, and can depend on a variety of factors.

While support for college expenses is regularly included in a Judgment for Dissolution, Illinois case law is inconsistent regarding the correct measure of a parent's financial obligations. Regardless of such lack of uniformity in judicial rulings, the Illinois post-majority support statute is specific with regard to the criteria a court must consider in making its determination. According to 750 ILCS 5/513(b):

> In making awards under paragraph (1) or (2) of subsection (a), or pursuant to a petition or motion to decrease, modify, or terminate any such award, the court shall consider all relevant factors that appear reasonable and necessary, including:
>
> (1) The financial resources of both parents.
>
> (2) The standard of living the child would have enjoyed had the marriage not been dissolved.
>
> (3) The financial resources of the child.
>
> (4) The child's academic performance.

Other "relevant factors" include the cost of the school, the programs offered at the school, the child's scholastic aptitude, and the benefit the child will receive from going to that school. *People ex rel. Sussen v. Keller*, 892 N.E.2d 11 (Ill. App. 2008). Additionally, the court will consider whether the parent will be obligated to pay for a private school education when adequate public schools are available. *Id*.

750 ILCS 5/513(b)(1) is commonly interpreted to mean that contributions to college expenses of post-majority children will be determined in proportion to the financial ability of each parent. When both parties have adequate means, courts commonly figure the allocation of college support due in proportion to the parties' respective incomes. *Flatley v. Flatley*, 356 N.E.2d 155 (Ill. App. 1976). When the parties' incomes are not equivalent, an uneven percentage allocation is permissible. *In re Marriage of Zukausky*, 613 N.E.2d 394 (Ill. App. 1993). However, this is not always the case. The Court in *In re Marriage of Stockton* refused to base support calculations solely on a ratio of the parties' gross income, but insisted that the Court consider all appropriate equitable factors instead, including the financial resources of both parents, the financial resources of the child, and the standard of living the child would have enjoyed had the marriage not been dissolved. 523 N.E.2d 573 (Ill. App. 1988).

Therefore, one's ability to pay alone is not dispositive of the factors the court must balance in awarding support for college. The court will weigh the ability to pay with regard to all available resources. *In re Marriage of Fahy*, 567 N.E.2d 552 (Ill. App. 1991). Courts are required to set an award that falls within a parent's economic capacity. *In re Marriage of Thurmond*, 715 N.E.2d 814 (Ill. App. 1999). No college support will be ordered when a parent's expenses exceed his income. *Singer v. Singer*, 388 N.E.2d 1051 (Ill. App. 1979).

Even though a court cannot order a parent to pay more than he or she can afford (*In re Support of Pearson*, 490 N.E.2d 1274 (Ill. 1986)), the burden of proof is on the parent to disprove the other statutory factors as also being applicable. Such other factors were a relevant consideration in *In re Marriage of Cianchetti*. (15 N.E.2d 17 (Ill. App. 2004). Regardless of his reduced income, the Court found that the father was responsible for private college expenses that he claimed were out of his reach. *Id*. The Court reasoned that, because the father had paid private high school tuition for his children in the past, he could afford to provide for private college support in the future. *Id.*

In light of the speculative nature of future income and the rising costs of education,

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Office
Illinois Bar Center
424 S. Second Street
Springfield, IL 62701
Phones: 217-525-1760 OR 800-252-8908
www.isba.org

Editor
Terra C. Howard
P.O. Box 2174
Glen Ellyn, IL 60138-2174

Managing Editor/ Production
Katie Underwood
kunderwood@isba.org

courts can interpret the provisions for college set forth in marital settlement agreements. *In re Marriage of Schmidt*, 684 N.E.2d 1355 (Ill. App. 1997). When an agreement does not specify the numerical amount of college support each party will be responsible for, the marital settlement agreement is to be interpreted according to contract law. *Ingrassia v. Ingrassia*, 509 N.E.2d 729 (Ill. App. 1987). Accordingly, the missing provision is implied to amount to a reasonable expense for college. *Id.* While reasonable expenses are allowed in support provisions, unlimited expenses are not. *In re Marriage of Roth*, 426 N.E.2d 246 (Ill. App. 1981). Reasonable expenses for college might include public school tuition and possibly, additional living expenses. Unlimited tuition expenses for more expensive private higher education institutions are not necessarily considered a reasonable expense. The expenses must be deemed reasonable in light of the desired education, the parent's income and standard of living, and the specific circumstances of each case. *Schmidt*, 684 N.E.2d 1355.

In line with this reasonableness standard, courts recognize that not every child has an absolute right to a college education. So, when a public education is available and more affordable than public school, courts typically prefer to align their award with potential public school expenses. *Spear*, 613 N.E.2d 358. Courts have even gone so far as to say that a child has a duty to minimize educational expenses and can do so by attending an inexpensive college. *In re Marriage of Korte*, 549 N.E.2d 906 (Ill. App. 1990). Although courts sometimes allow for a private education even when a public education is available, they often find the disparity in expense as compared with similar learning opportunities to be inequitable. *Cooper v. Cooper*, 430 N.E.2d 379 (Ill. App. 1981).

When public choices are available, courts have provided for college support in line with these choices. In *Schmidt*, the Court figured a parent's financial obligation considering the price range for state schools, together with the parent's occupation and income. 684 N.E.2d 1355. The Court further emphasized that a support order for college expenses does not entitle the child to enroll at any school of his or her choice. *Id.* The person requesting support must prove why his or her choice is more desirable, while the only defense required is to present comparable schools with more reasonable expenses and evidence of financial status. *Id*.

If colleges and their courses of study are comparable in material ways, such as post-graduation employment rates and class offerings, courts are reluctant to favor private schools over public schools. *Sussen,* 892 N.E.2d 11. Custodial parents are not free to choose a more expensive school without a specific reason. *Id*. The chosen school must be marked by special attributes and must be proven to be both necessary and more appropriate for the child. *Id.* The person requesting support for the more expensive school must clearly demonstrate to the court why that school is superior to all more affordable choices. *Pearson*, 490 N.E.2d 1274.

As previously mentioned, a child's academic performance is one factor courts use to allocate support for college expenses. In some cases, a good student can be found to be deserving of a private school education. *Wilcutts v. Wilcutts*, 410 N.E.2d 1057 (Ill. App. 1980). In others, the court penalizes children and alters support when their academic performance is not satisfactory. *Greiman v. Friedman*, 414 N.E.2d 77 (Ill. App. 1980).

In *Greiman*, a child willfully extended her post-secondary education beyond the usual eight semesters, and so the child was ordered to pay a share of the costs it would take to complete her degree. *Id.* In the same case, another faltering child was made partially responsible for the payment of her college expenses if she could not maintain a C average. So, although the parents were not entirely relieved of support for their underachieving children, financial conditions affecting their support obligations were instituted to encourage the children to achieve.

While the statutory law on this subject remains clear yet produces variable results in Illinois, the use of common law factors have produced more regular rulings. The first such factor, estrangement, has received consistent treatment in Illinois courts at every level. Inevitably, dissolution often produces acrimonious results. Estrangement between parents and their children who no longer live with them due to divorce is not uncommon. It is a frequent consequence of divorce that a parent may grow apart from his or her children. *In re Marriage of Drysch*, 732 N.E.2d 125 (Ill. App. 2000). Accordingly, many parents question their continued duty to support a child who no longer desires a favorable relationship of any sort.

However, the prevailing judicial view in Illinois is that support is not conditioned on a continued, positive relationship between parent and child. *In re Marriage of Sreenan*, 402 N.E.2d 348 (Ill. App. 1980). A negative or virtually non-existent relationship with one's child does not relieve a parent of the obligation to contribute to college expenses. *Drysch,* 732 N.E.2d at 132. Courts refuse to penalize a child in need because of the weak relationship he may have with one parent as a result of a contentious divorce. *Id*. Courts reason that basing support on the strength of the parent-child relationship is contrary to the purpose of Section 513, which is to protect children from the disadvantages of divorce by making funds available for their education. *In re Marriage of Harsy*, 549 N.E.2d 995 (Ill. App. 1990). Many courts feel they must mitigate the hardships of children of divorce if they cannot rely on divorced parents for the normal protection of the child. *Maitzen v. Maitzen*, 163 N.E.2d 840 (Ill. App. 1960).

Courts have indicated that one can establish a lack of relationship between a parent and a child as an affirmative defense to a college support obligation, but that is noted as a singular common law factor only and not one in provided in the statute. *Gibb v. Triezenberg*, 544 N.E.2d 444 (Ill. App. 1989). Estrangement must be combined with other factors to materially contribute to a support decision of any sort.

Another common law consideration in determining post-majority support is the role each parent plays in making major choices that impose substantial financial obligations. Where there is a clause ordering joint custody in a marital settlement agreement, one party cannot disregard the other parent in decision-making. *In re Marriage of Campbell*, 624 N.E.2d 1230 (Ill. App. 1993). It is accepted that custody generally dictates choice in the area of education. *Wisconsin v. Yoder*, 406 U.S. 205 (1972); *In re Marriage of Tisckos*, 514 N.E.2d 523 (Ill. App. 1987). Therefore, it follows that joint custody necessitates joint decision-making. In the absence of a discussion to make a joint decision, however, silence by one party does not indicate acquiescence to or agreement with the decisions of another. *Campbell*, 624 N.E.2d 1230.

However, Illinois courts have held that a parent is obligated to pay for college expenses even if that parent did not participate in selecting the school. *In re Marriage of Houston*, 501 N.E.2d 1015 (Ill. App. 1986). There is no legal merit in the idea that one is excused

from contributing to educational expenses because one was not consulted in advance about them. *Hight v. Hight*, 284 N.E.2d 679 (Ill. App. 1972). Furthermore, courts have suggested that, in cases of estrangement, minimum contact between parent and child does not enable any meaningful discussion about college selection, so consultation is likely to be unproductive. *Id.*

Yet *Van Nortwick v. Van Nortwick* seems to contrast this idea. 230 N.E.2d 391 (Ill. App. 1967). In *Van Nortwick*, the Court ruled that parties must attempt to select a school mutually before requesting relief. *Id.* The person with custody must initiate the discussion and cannot assume that a failure to discuss school choice indicates consent to pay for the school of choice. *Id*. There is no financial burden on the parent who was not consulted. *Id.* If a parent wants the sole voice in making a college decision, then she must accept the full financial burden of making that choice unilaterally. *Id.*

In *In re Marriage of Schmidt*, the Court illustrated how this type of unilateral decision-making is impermissible in cases of joint custody by describing the absurd results this would have in a marital relationship. 684 N.E.2d 1355 (Ill. App. 1997). The Court stated that married couples would make a joint decision based on many factors, including cost; one of spouses would not decide the matter on her own and then ask the other to write a check. *Id.* However, if a Petition is filed addressing the matter prior to enrollment or attendance, then no fait accompli attaches because no expenses have accrued in advance. *In re Marriage of Spear*, 613 N.E.2d 358 (Ill. App. 1993).

For this reason, the non-custodial parent will not be precluded from paying for college expenses, regardless of his lack of participation in making the school choice, when the matter is brought to the attention of the court before unsanctioned educational expenses accumulate. *In re Marriage of Moriarty*, 478 N.E.2d 537 (1st Dist. 1985). The Court in *Flatley v. Flatley* held that, "Perhaps it is in the best family tradition for a child to seek the counsel of each parent when selecting a college he or she might attend. But as worthwhile as such a tradition might be, it has not attained the status of absolute duty in Illinois." 356 N.E.2d 155 (Ill. App. 1976).

Therefore, the application of *Van Nortwick* is somewhat limited in realistic familial situations. The tradition of common law in Illinois does not necessarily require a consensus to be reached by all parties before making a decision, regardless of the stipulations in the original marital settlement agreement.

Although the impact of both estrangement and alienation on a relationship can be similar, there is no prevailing case law in Illinois to suggest that a course of purposefully alienating the child from his non-custodial parent will affect the college support obligation. This issue remains unclear, as there is no statute or judicial decision that clearly outlines the effect of intentional alienation by one parent on the college support obligation of the other parent. Other states, however, have addressed the relationship between alienation and support for college expenses and provide limited guidance in this respect.

Because of the contentious nature of divorce, parents often utilize the devotion and affections of their children to exert control over one another. As a result, it is not uncommon for a parent with the primary care or custody of the children to alienate them from their other parent in an effort to secure sole control of the familial situation. When this is accomplished, some might argue that the parent responsible for alienation also secures sole responsibility for the family's financial situation as well. For example, in New Jersey, the Supreme Court held that a parent who had been alienated from his daughter was not obligated to contribute to her college education. *Gac v. Gac,* 897 A.2d 1018 (N.J. 2006). The father's gifts and letters were returned with a note from the daughter saying, "We don't want to hear from you. We don't want anything to do with you." *Id*. Regardless of the resources involved, the purposeful alienation of the non-custodial parent was a factor significant enough to vacate a post-majority financial obligation.

In light of the unsteady economy, college seems less of a certainty than ever before. This could result in a predictable increase in contested matters related to additional support for post-majority education in Illinois. And, although the statute is clear as to relevant factors, the courts will also look to the common law tradition when considering non-statutory elements, such as estrangement and parental consultation. With respect to alienation, Illinois will inevitably need to consider the same reasoning other states have used to reach an equitable conclusion on the issue. ■

Girls' empowerment groups: Shaping the next generation of female leaders

By Mary F. Petruchius

> "Gender equality and women's empowerment are fundamental to ... achieve equal rights and dignity for all. This is a matter of basic human rights."
>
> —U.N. Secretary-General Ban Ki-moon.

It's not easy for girls coming of age in today's media- saturated world to develop a healthy sense of self-worth, self-respect, and purpose as they prepare for their futures. In order to emerge from their teen years as strong, happy, and confident young women, girls must learn to successfully navigate peer pressure and negative messages about girlhood and womanhood. These influences have the potential to negatively impact their self-esteem, identity development, health behaviors and ability to make positive life decisions.

Girls' empowerment programs can substantially undercut delinquency and victimization of girls. These programs identify the risk factors associated with female adolescent problem behaviors, such as failure to complete high school, teen pregnancy and parenting, low self esteem and prior victimization, to help prevent girls from entering the juvenile justice system. Once involved in the juvenile justice system, girl offenders can be rehabilitated with a curriculum that focuses on developing girls' bonding, goal-setting skills, self-esteem, mental health, attachment to school, violence prevention, issues with authority and substance abuse prevention using such community-based programs, rather than the more intensive and restrictive institutional facilities.

Girls who are empowered with the information taught in these groups are equipped with tools and information to make positive choices and educated decisions regarding their lives. Such groups encourage the development of critical thinking skills and academic achievement, thus discouraging delinquent behavior.

Empowering Our Girlz (EOG) is a not-for-profit mentoring organization based in Chicago that serves as resource and network of support for girls ages 10-18. The organization's goal is to empower young girls with their own potential to be leaders in their lives as well as in their communities. **EOG's** core program provides a series of seminars lead by various community leaders with a goal to boost participants' physical and social health. **EOG's** vision is to assist girls with goal setting and ultimately achieving a higher level of success when it comes to graduating from high school. **The E.O.G. Creed is:**

E-Everything around me deserves respect and will receive it starting with above all myself.

O-Obstacles are the struggles that will build my strength and see me threw to success.

G-Greatness is what I have and great is who I AM

If you would like to learn more about **Empowering Our Girlz**, you may like them on Facebook, follow them on Twitter or call 773.305.7588.

Cultured Pearls Empowerment Group for Girls, founded in 2011, has provided many services for young girls, ages 10-17 in the Chicago-land area. The participants are paired with professional business women who serve as mentors and advocates. They participate in character building series and workshops and give back to their community through community service, including volunteering at shelters, reading to children at the library and quilt-making for expectant teen mothers.

The **Cultured Pearls** Web site states the following:

> We believe that empowerment originates from education. We are grounded in love and free from judgment, with the understanding that everyone has the ability to teach. We are committed to our community; our immediate community and beyond. We are committed to helping others. We are committed to renewing the spirit of our own. We use the media and the world around us as teachable moments in order to show our youth that the world that they wish to live in already exists, but is yet to be seen because it takes action and work. Every person on the staff (including mentors) of Cultured Pearls Empowerment Group for Girls has a story that needs to be told. We identify with our participants because we have lived through various circumstances and situations, we have all "beat the odds" in some kind of way and we all understand that we are where we are in life in order to help others.
>
> We believe that we will be influential in reversing the statistics that apply to our young minority girls, one life at a time. We are "cultivating our girls for greatness" with bi-monthly meetings that focus on self esteem, health and wellness, higher education, and etiquette, with a foundation of service to our immediate community and those abroad.

The De Kalb County Youth Services Bureau's **Girls Empowerment Group (GEP)** encourages girls to seek and celebrate their "true selves" by giving them a safe space, encouragement, structure and support to embrace their important journey of self discovery. A strength-based approach helps girls identify and apply their power and voice as individuals and as a group focusing on issues that are important in the lives of adolescent girls. Topics include learning about self, connecting with others, exploring healthy living and planning for the future. The aim of the program is to provide education and supportive counseling geared toward the specific needs of adolescent girls.

Winnebago, De Kalb and McHenry Counties have joined "Girls on the Run of Northwest Illinois," a national organization that promotes healthy eating and body image for young girls from 3rd through 8th grade, as well as teaching about cooperation. The program combines training for a 5K running event with healthy living education. It instills self-esteem through health education, life skills development, mentoring relationships, and physical training, which are accomplished through an active collaboration with the girls and their parents, schools, volunteers, staff, and the community. Girls on the Run's mission is to…"inspire girls to

be joyful, healthy, and confident using a fun, experience-based curriculum that creatively integrates running."

During the 10-week program, girls learn a different lesson about topics such as self-respect, positive self-talk, healthy eating, body image, peer pressure, and bullying. Activity and team building are constant themes of Girls on the Run. The program's motto is, "Preparing girls for a lifetime of self-respect and healthy living." For more information about forming a **Girls on the Run** program in your community, please call **815.893.0259**.

In McHenry County, Spring Grove has a girls' empowerment group for 6th, 7th, and 8th graders. This program provides a small group experience and it assists girls in strengthening their personal self development through discussion and self-awareness activities. By focusing on self-esteem, personal expression, and self respect, girls gain confidence and tap into their unique potential.

Girl Talk is an Atlanta, Georgia-based international non-profit peer-to-peer mentoring program in which high school girls mentor middle school girls to help them deal with the issues they face during their formative early teenage years. Its mission is to help teen girls build self-esteem, develop leadership skills and recognize the value of community service. Since 2002, **Girl Talk** has served more than 40,000 girls in 43 states and 7 countries.

Through weekly chapter meetings facilitated by high school **Girl Talk** leaders, **Girl Talk** helps middle school girls learn from their peer mentors and better understand and address the issues they face. The girls develop confidence, leadership skills and compassion. **Girl Talk** provides the curriculum of life lessons used to facilitate the discussions at no charge. For more information on Girl Talk, go to its website, **www.mygirltalk.org**.

The Internet is full of websites that reach out to girls around the world to inspire and empower them. I urge the reader to check out **www.sheheroes.org**, which lists its following Top 10 Websites that are helping to empower girls: 7Wonderlicious; Girls Can't What?; Girl Talk (mentioned above); Targeting Teens; Educating Girls Matters; L'Oreal USA for Women in Science; Hardy Girls, Healthy Women; New Moon Girls, and Girls, Inc.

What can we do? For starters, we can advocate for laws and policies that will protect girls and promote girls empowerment. By closely scrutinizing the media, we can be aware of how race, gender roles, and stereotypes shape television programs, video games, books, music videos, cartoons, blogs, and Web sites. We can make sure that we consciously purchase products and support organizations that stress inclusion and convey positive messages about women. We can also commit to volunteering to mentor a girl or young woman and/or become directly involved in one of the many programs mentioned in this article or find one of our own online.

If young women grow up instilled with positive perceptions of themselves and informed in their choices, they can be the role models for future generations! ■

Mary F. Petruchius is a solo general practitioner in Sycamore, IL. She is the incoming 2013-2014 Chair of the Standing Committee on Women & the Law. Mary is also the CLE Coordinator for the Diversity Leadership Council and a member of the Child Law Section Council for 2013-2014. She can be reached at marypet@petruchiuslaw.com and her website is www.petruchiuslaw.com.

Upcoming CLE programs

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September

Thursday, 9/5/13- Teleseminar—Generation Skipping Transfer Tax Planning. Presented by the Illinois State Bar Association. 12-1.

Monday, 9/9/13- Chicago, ISBA Chicago Regional Office—ISBA Basic Skills Live for Newly Admitted Attorneys. Complimentary program presented by the Illinois State Bar Association. 8:55-5:00.

Tuesday, 9/10/13- Teleseminar—Choice of Entity for Real Estate. Presented by the Illinois State Bar Association. 12-1.

Tuesday, 9/10/13 – Webinar—Intro to Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 10:00 – 11:00 a.m. CST.

Wednesday, 9/11/13- Chicago, ISBA Chicago Regional Office—2013 Cyberlaw Symposium. Presented by the ISBA Intellectual Property Section. 8:45-5.

Wednesday, 9/11/13- Live Webcast—2013 Cyberlaw Symposium. Presented by the ISBA Intellectual Property Section. 8:45-5.

Thursday, 9/12/13 – Webinar—Advanced Tips for Enhanced Legal Research on Fastcase. Presented by the Illinois State Bar Association – Complimentary to ISBA Members Only. 10:00 – 11:00 a.m. CST.

Thursday, 9/12/13- Teleseminar—UCC 9: Fixtures, Liens, Foreclosures and Remedies. Presented by the Illinois State Bar Association. 12-1.

Thursday, 9/12/13- Chicago, ISBA Regional Office—Trial Practice Series: The Trial of a Retaliation Case. Presented by the ISBA Labor and Employment Section. 8:55-4:15.

Thursday, 9/12/13- Live Webcast—Trial Practice Series: The Trial of a Retaliation Case. Presented by the ISBA Labor and Employment Section. 8:55-4:15.

Monday, 9/16-Friday, 9/20/13 - Chicago, ISBA Regional Office—40 Hour Mediation/Arbitration Training. Presented by the Illinois State Bar Association. 8:30-5:45 daily.

Tuesday, 9/17/13- Springfield, INB Conference Center—Fracking in Illinois- Facts and Myths Explained. Presented by the ISBA Environmental Law Section; co-sponsored by the ISBA Real Estate Law Section, the ISBA General Practice, Solo & Small Firm Section, and the ISBA Agricultural Law Section. 8:30-5:00.

Tuesday, 9/17/13- Teleseminar—Transactions Among Partners/ LLC Members and Partnerships/LLCs- Major Tax Traps for the Unwary. Presented by the Illinois State Bar Association. 12-1. ■

Child Law

Illinois Bar Center
Springfield, Illinois 62701-1779

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