

spring
2025

FAMILY LAW News

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Issues of Family Law News



Published by the Family Law Section of The State Bar of Arizona. Statements or opinions expressed herein are those of the authors and do not necessarily reflect those of the State Bar of Arizona, its officers, Board of Governors, Family Law Executive Council, the Editorial Board or Staff.



FROM THE CHAIR

LISA McNORTON

Renewing and growing

THE SECTION IS PROUD TO CONTINUE OFFERING
INFORMATION ABOUT UPCOMING CLE PROGRAMMING THAT
COVERS VARIOUS ASPECTS OF FAMILY LAW

A S WE FLY THROUGH SPRING and launch into the joy of the Arizona summer, not only should we look back at what we have achieved so far this year, but also look forward to what more we can do in renewing and growing, both personally and professionally.

To that end, the Section is proud to continue offering information about upcoming programming touching on various aspects of family law. Whether you are looking for ethics credit, exploring the intersection of criminal and

family law, staying up to date with case and legislative updates, or learning about business valuations, the upcoming CLEs are sure to fill your plate with much to learn.

Not only will you learn valuable tricks and tools, you will be able to engage in professional and social networking, associating with old friends and making new connections that can also enhance your practice.

Please join us at some of our upcoming events, and remember that we are always on the look out for timely articles to add to our newsletter! **FL**

“One of the biggest keys to success is renewing our minds daily”

JARED PILLAI

PAYING TRIBUTE *TO JARED SANDLER, ESQ.*

The Family Law Section would like to pay tribute to Jared Sandler, one of our members who recently passed away and contributed so much to our Arizona family law community during his career.

As aptly put by the Arizona Mediation Institute, where he was most recently a mediator: *"It is with profound sadness that we share the news of the passing of our esteemed colleague, Jared Sandler. Jared was not only a dedicated member of our team but also a cherished friend to many. His unwavering commitment to excellence and his compassionate approach to mediation touched the lives of many individuals. Jared was a well-respected member of our legal community, and his legacy will continue to inspire*



us as we strive to uphold the values he embodied. His kindness, wisdom, and professionalism will be greatly missed by all who knew him. We extend our heartfelt condolences to Jared's friends and loved ones during this difficult time. May his memory be a source of comfort and strength."

<https://arizonamediation.com/partners/jared-sandler-esq/>

Jared's Celebration of Life was held on April 16th at The Parlay Kitchen and Cocktails in Scottsdale, AZ.

Jared's Memorial Mass was held April 28th at St. Joan of Arc Catholic Church in Phoenix, AZ. 



Celebration of Life

JARED SANDLER, ESQ.



ARIZONA
MEDIATION
INSTITUTE



JUDGE FISK'S TOWN HALL

Family Department Presiding Judge Fisk recently held a virtual Town Hall addressing some changes that will be implemented in the coming months in the family court system.



The Family Department Presiding Judge Fisk

recently held a virtual Town Hall addressing some changes that will be implemented in the coming months in the family court system. Two updates we wanted to highlight relate to the restructuring of the family department and updated zip code boundaries. Keep an eye out for more information regarding these and other changes coming soon!

Family Department Restructuring

Effective 06/30/2025, the Family Department will be eliminating two Commissioner Matrix divisions.

- Eliminating one division at both Northeast & Southeast.
- Commissioner Matrix will be staffed by 10 Commissioners.

Effective 06/02/2025, the Family Department will start adding five new Family Trial Calendars.

- Family Trial Calendars will be added at Northeast (2), Northwest (1), and Southeast (2).
- Five new Family Trial Calendars will be run by Commissioners (using 2 existing Family Commissioner positions + 3 new Commissioners).
- 33 Family Trial Calendars will be staffed by 28 Judges and 5 Commissioners.


Judge Ronda Fisk talked about the restructuring of the family department and updated zip code boundaries during a virtual town hall meeting on April 30th, 2025.



Updated Zip Code Boundaries

Newly filed cases are assigned to a region based on the ZIP code of Petitioner or their legal representative.

- **A02024-100 (effective 10/14/2024)** adjusted ZIP codes boundaries, addressed caseload imbalance between Southeast/Northwest (higher) and Downtown/Northeast (lower).

- **A02025-065 (effective 06/30/2025)** will move some ZIP codes from Downtown to Northeast & Northwest and from Northeast to Northwest. 



If you missed the virtual Town Hall in April, and would like to learn more and see what you missed [click here](#) for the full slide show presentation.

“

THE ADJUSTED ZIP CODES BOUNDARIES, ADDRESSED THE CASELOAD IMBALANCE BETWEEN SOUTHEAST/NORTHWEST (HIGHER) AND DOWNTOWN/NORTHEAST (LOWER).

”

ZIP Code	Assignment in AO2024-100	Reassigned in June 2025
85301	Downtown	Northeast
85303	Downtown	Northeast
85305	Downtown	Northeast
85381	Northeast	Northwest
85382	Northeast	Northwest
85340	Downtown	Northwest

by LYNTON KOTZIN, CPA, ABV, ASA, CFA, CBA, CFF, CIRA

Top-Down Process: Understanding Business Valuation —Part Two

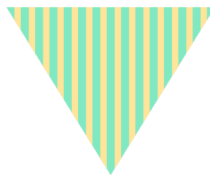
A properly performed business valuation is a complex process that requires a systematic approach and incorporation of specific steps and analyses.

Economic and Industry Analysis - It is important to understand that no business can be valued in a vacuum, as the performance of a business is dependent on overall economic and industry conditions. Depending on the nature of the subject company, some aspects of the overall economy may be more relevant. For instance, for companies that operate in the construction sector, interest rates and demographic trends can significantly influence the outlook for the business. When determining value, a prospective investor will temper the use of historical and prospective financial information on the basis of anticipated general economic conditions as well as the outlook for the particular industry when determining value.



The Top-Down Approach
- When determining value, a prospective investor will temper the use of historical and prospective financial information on the basis of anticipated general economic conditions as well as the outlook for the particular industry when determining value.





Investment Analysis

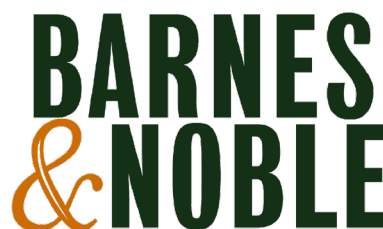
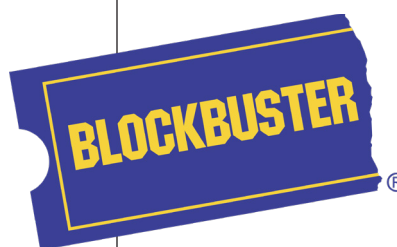
[in- 'ves(t)-mənt ə-'nɑ-lə-səs]

Researching and evaluating an investment to predict its future performance and determine its suitability to a specific investor.

Knowledge of an industry's prospects and risks is also an integral aspect of the valuation process, as the performance of a business is dependent on relevant industry trends, conditions, and other external factors.

This is likely truer today than it was when Revenue Ruling 59-60 was issued, as the pace of change in the business world has accelerated tremendously, and technological advances can have a significant impact on the outlook for a company. The business landscape is littered with companies that were once valuable industry leaders and are now obsolete due to significant changes in their respective industries. Examples include Eastman Kodak, Barnes & Noble, Blockbuster Video, and Toys "R" Us. The valuation analysis therefore needs to properly analyze and understand the industry including the future outlook, growth prospects, competitive structure, and any disruptive technologies that may significantly change the industry.

The business landscape is littered with companies that were once valuable industry leaders and are now obsolete due to significant changes in their respective industries. Examples include Eastman Kodak, Barnes & Noble, Blockbuster Video, and Toys "R" Us.



COMPANY ANALYSIS

Another key aspect of any valuation engagement is understanding the company-specific attributes. These include but are not limited to competitive and financial position history, its customer base, the nature of its products and services, and other qualitative factors. The valuation analysis should address the qualitative characteristics of the company and provide an in-depth understanding of the company's current operations, future outlook, competitive positioning, customer and supplier concentrations, intangible assets, and growth prospects.

FINANCIAL STATEMENT ANALYSIS

Financial performance and volatility provide essential insight into what an investor might reasonably expect from future performance, and it offers an overview of the company's risk profile. The key to a thorough

A valuation report should convey to the user of the report how and why a company's past financial results and current financial position influence the company's overall risk profile.



Financial Analysis

[fə-'nan(t)-shəl ə-'nā-lə-səs]

The process of evaluating businesses, projects, budgets, and other finance-related transactions to determine their performance and suitability.

in which the company operates, and the relevant national and local economic trends that directly impact the company. The analysis of these factors provides an understanding of the company's overall risk profile and facilitates the determination of an appropriate required rate of return for an investment in the business and the selection of relevant market multiples. At the completion of the risk analysis process the valuation

Risk analysis is an integral part of the valuation process. It is the culmination of the risk assessment process... based on an analysis of a company's qualitative characteristics, historical operating results, relevant outlook for the industry, ...

valuation, though, is not only to compute various ratios and financial gauges but to use them to assess the company's overall risk profile. This part of the process is highly integrated with other parts of the valuation, particularly the industry and company analyses. A valuation report should convey to the user of the report how and why a company's past financial results and current financial position influence the company's overall risk profile.

RISK ANALYSIS

Risk analysis is an integral part of the valuation process. It is the culmination of the risk assessment process and is based on an analysis of a company's qualitative characteristics, historical operating results, the relevant outlook for the industry or industries

specialist should be ready to properly apply the valuation approaches.

APPLICATION OF VALUATION APPROACHES

There are three traditional approaches to valuing an interest in a company. Within each approach, various methods are typically used. The three valuation approaches include:

- The **"income" approach**, which involves the conversion of expected future cash flow into a present value.
- The **"market" approach**, which determines value by comparison with transactions in similar businesses or business interests.
- The **"asset based" approach**, which incorporates the valuation of all the company's assets and liabilities (the asset values are totaled, and the liabilities are subtracted to determine an adjusted net equity value of the business).



The valuation specialist is required to consider each of these approaches but as discussed below the ultimate value conclusion will be based on the valuation specialist's consideration of the relative merits of each of the approaches to value and the underlying methods applied under each of the approaches.

Valuation Synthesis and Conclusion

In reaching the overall conclusion of value, the appraiser considers the indicated values derived from each valuation approach in relation to the relative merits of each approach based on the specific facts and circumstances of each analysis. One primary advantage of employing multiple approaches is that they compel the business appraiser to reconcile differences in the value conclusions. The reconciliation process allows the valuation specialist to revisit the assumptions and judgment calls made during the valuation process. It is through this reconciliation process that the appraiser develops a comfort level with the applicability of the various methods, and this is eventually reflected in the weightings applied to the various value conclusions derived using the different approaches and methods.

According to the Business Valuation Standards promulgated by the American Society of Appraisers:

The selection of and reliance on appropriate methods and procedures depends on the judgment of the appraiser and not on any prescribed formula. One or more approaches may not be relevant to a particular situation, and more than one method under an approach may be relevant.

The appraiser must use informed judgment when determining the relative weight to be accorded to indications of value reached on the basis of various methods, or whether an indication of value reached from a single method should dominate. The appraiser's judgment may be presented either in general terms or in terms of mathematical weighting of the indicated values reflected in the conclusion. In any case, the appraiser should provide the rationale for the selection or weighting of the methods relied on in reaching the conclusion.¹

Reasonableness Tests

One of the final steps in the valuation process is a "reasonableness check." The final value conclusion should always be assessed with the question, "Is it reasonable?" To address the reasonableness of the value conclusion, the appraiser performs an analysis of financial feasibility, implied valuation multiples, and implied intangible value.

Conclusion

Armed with this general understanding of the many essential components that are incorporated into a business valuation analysis, all stakeholders in the valuation of a company can appreciate the risks of unduly simplifying the analysis or narrowing the scope of the work to be performed. **FL**



Providing Value Worldwide

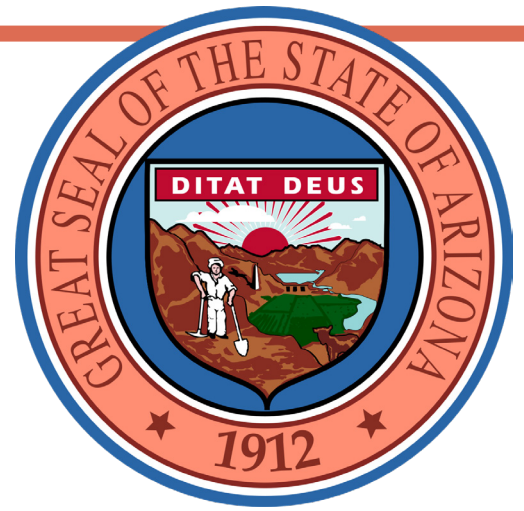
FOOTNOTES

¹ American Society of Appraisers, Business Valuation Standards, BVS-VI - Reaching a Conclusion of Value.

LYNTON KOTZIN is an Executive Vice President in the Phoenix office of J.S. Held, LLC and can be contacted at 1-602-544-3552, lkotzin@jsheld.com

Legislative Update

The Family Law Executive Council, Keeping You Informed
(May 18, 2025)



STATE BAR
OF ARIZONA

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AS YOU KNOW, the Arizona Legislature is not in session as of May 18, 2025 and have therefore concluded their session for the year. But, in an effort to keep you

informed, the Family Law Executive Council would like to provide updates regarding legislation that may affect your clients. Remember legislation can change, so we encourage you to inquire on the current status of any laws and bills using the resources below.

In order to track laws, legislation, and bills as they progress through the legislature go to: <https://www.azleg.gov/> or <https://www.azleg.gov/bills/>

To contact your Representative or Senator go to: <https://www.azleg.gov/MemberRoster/>

GOVERNOR HOBBS RECENTLY SIGNED A FEW BILLS INTO LAW THAT RELATE TO FAMILY LAW THAT ALL FAMILY LAW PRACTITIONERS SHOULD BE AWARE OF:

House Bill 2432: This bill addresses safe exchange locations and establishes requirements for sheriffs and

for specific language to be included in all Parenting Plans.


House Bill 2432: [Follow this link to read the bill 432H.pdf](#)

House Bill 2079: This bill provides updated requirements for court appointment of a guardian for a minor.

House Bill 2079: [Follow this link to read the bill 432H.pdf](#)

GOVERNOR HOBBS VETOED HOUSE BILL 2256. THIS BILL WOULD HAVE PROHIBITED THE FAMILY COURT FROM MAKING A DECISION BASED SOLELY ON AN ALLEGATION OF PARENTAL ALIENATION.

House Bill 2256 - Vetoed: This bill would have prohibited the family court from making a decision based solely on an allegation of parental alienation. This ultimately would have impacted judges' ability to interview children and appoint and rely on CAA's recommendations. Governor Hobbs recognized the harm this could have for minor children.

Vetoed House Bill 2256: [Follow this link to read Governor Hobbs' letter explaining her decision to veto this bill.](#) 



Summaries will be shared each month with all members of the Family Law Section. These include summaries for published cases, as well as unpublished memorandum decisions.

Retired Judge Bruce Cohen graciously prepares case summaries for all of the decisions issued from Division I and II each month and has agreed to share those summaries with all the members of the Family Law Section. These include summaries for published cases, as well as unpublished memorandum decisions, and they are organized by issue (parenting issues, child support, spousal maintenance, property

You should receive an email notification each month when the summaries are posted to the online discussion board. If you are not, you can change your settings at the top of the web page to receive either real time or daily notifications.

and debt, procedural matters, etc.). Each month, the summaries will be shared on the Arizona State Bar Family Law Section's Online Community. You should also receive an email notification each month when the summaries are posted to the online discussion board (if you are not, you can change your settings at the top of the webpage to receive either real time or daily notifications). Below are the links to the most recent case summaries and keep an eye open each month for updated case summaries posted to the Online Community discussion board in the future! [FL](#)

[March 2025 Case Summaries](#)

[April 2025 Case Summaries](#)



By
Ret. Judge Bruce Cohen

These program tracks may qualify for MCLE hours, Family Law Specialization hours, Family Law credit hours or even other tracks.



UPCOMING

CLEs



Arizona State Bar Convention
Monday, June 23, 2025
Time: 8:45 a.m. – 12:00 p.m.
The Intersection of Criminal and Family Law

Brief Description of the Program - The Family Law and Criminal Justice Sections have joined forces to provide you a comprehensive overview of the intersection between family and criminal law. We will explore issues such as domestic violence, orders of protection, law enforcement involvement, and drug convictions and we will discuss the impact of criminal allegations on divorce disputes, especially parenting time and legal decision-making issues. In our discussion, we will work to instruct the attendees on the best practices for handling sensitive cases where family and criminal matters converge, offering practical insights into managing complex cases that require knowledge in both areas of the law.

You will learn:

- What Family Law presumptions are impacted by a criminal allegations, arrest, or conviction and how to rebut those presumptions.
- How to navigate domestic violence and other criminal arrests/convictions—for both the accused and the victims of criminal behavior.
- How to balance a client's criminal defense interests and the client's interests in the family court process.
- The best practices for managing complex cases involving both family and criminal law.

Esteemed Presenters:

Flynn Carey
 Judge Bruce Cohen (Ret.)
 Norma Izzo
 Judge Wendy Million
 Shannon Peters
 Judge Stephen Umpleby
 Judge Joseph Waters
 Gregg Woodnick

Register today on the State Bar website.

CLE By the Sea
July 7-12, 2025
Navigating Rough Waters and
Bringing Calm Seas

Co-sponsored by the State Bar of Arizona Family Law Section - Our esteemed faculty is ready to chart the course through legal issues family lawyers are facing today. Explore the multifaceted nature of family law, where emotional, financial, and legal complexities intersect. From handling parenting decisions for special needs children, managing advanced financial matters and navigating the appellate processes, the sessions provide practitioners with the tools and knowledge needed to advocate effectively for their clients by adhering to the latest legal developments.


Seminar Chairs:

Gloria Cales, Gloria L. Cales, PC
 David Horowitz, Warner Angle Hallam Jackson & Formanek PLC

Faculty:

Sally Colton, Reardon House Colton PLC
 Lidiya Deane, Stout
 Taylor House, Reardon House Colton PLC
 Dr. Lori Love, Love & Alvarez Psychology
 Sandra Mayberry, Cage & Miles LLP
 Kristi Reardon, Reardon House Colton PLC

This program track may qualify for up to 12 hours MCLE, including up to 12 hours Family Law Specialization. Ethics credits available on Monday, July 7, 2025.

Register today on the State Bar website. 

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DATES

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2025
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Call 602-340-7349 or email: conventionstaff@staff.azbar.org with questions.

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**SAVE
THE
DATE**
July 7-10

2025
**CLE BY THE
SEA**

Coronado Island Marriott Resort & Spa
2000 Second Street | Coronado, CA 92118

Why Can't We All Just Get Along?



*Hosted by
Michael
Wozniak,
and Judges
Johnson,
and Fisk.
It satisfies 1
hour of ethics
CLE credit,
so mark your
calendars for
July 18, 2025!*

IS CURRENTLY POLLING INTEREST. DATES AND
DETAILS TO COME IN FUTURE NEWSLETTERS.

**FLEC
DIVERSITY
BOOK
CLUB**



IMPORTANT

DATES

June 23, 2025

Arizona State Bar (8:45am – 12:00pm)
**The Intersection of Criminal
and Family Law**

June 23-25, 2025

State Bar Convention
Save the Date

July 7-10, 2025

CLE by the Sea
**Navigating Rough Waters
and Bringing Calm Seas**

July 18, 2025

CLE Save the Date
Why Can't We All Just Get Along?
Michael Wozniak, Judge Johnson, and Judge Fisk

TBA

**FLEC is currently polling interest
in a diversity book club. Please
contact: nizzo@spencerfane.com**

Want to contribute to the next issue of Family Law News?
... If so, the deadline for submissions is July 14, 2025.



Would you like to...

- ▶ Express yourself on family law matters?
- ▶ Offer a counterpoint to an article we published?
- ▶ Provide a practice tip related to recent case law or statutory changes?

WE WANT TO HEAR FROM YOU!

PLEASE SEND YOUR SUBMISSIONS TO:

NICHOLAS J. BROWN, FAMILY LAW ATTORNEY

The Cavanagh Law Firm, P.A.

1850 North Central Ave. Suite 1900

Phoenix, Arizona 85004 | 602.322.4008

nbrown@cavanaghlaw.com

We invite lawyers and other persons interested in the practice of family law in Arizona to submit material to share in future issues.

Contact us!



We reserve the right to edit submissions for clarity and length and the right to publish or not publish submissions. Views or opinions expressed in the articles are those of the author. The Council invites those with differing views and opinions to submit articles for the newsletter. Thank you from the Family Law Executive Council and the State Bar of Arizona.