

**TOPICS FOR DIVORCE MEDIATION**    **Date:** \_\_\_\_\_ **Clients:**

\_\_\_\_\_

**1. Previous Agreements/Orders?**

- a. Pre-marital Agreement
- b. Post-marital Agreement/separation Agreement
- c. Existing court orders?
- d. Prior action?

**2. Date of Separation?**

- a. Have you separated physically?      If so When?
- b. Financially separated?      If so When?

**3. Do you have Children from this marriage?      Prior marriage?**

- a. Ages
- b. Legal custody/physical custody plans if known
- c. Historical and Current parenting arrangements
- d. School District/Home Schooling
- e. Childcare arrangements
- f. Health of the Children/special needs/tutors etc.
- g. Who has Health/Dental Insurance coverage
- h. Extra-curricular Activities/Summer camps/travel
- i. Explain scope/options for parenting plan

**4. Education of the Children: Private School/College?**

- a. How to be funded

**5. Relocation Desires/Concerns?**



- d. Gifts
- e. Post-Separation assets or debts?

**10. Business Interests?**

- a. Sole Proprietorship/Incorporated/Partnership
- b. Spousal participation
- c. At concept/IP stage

**11. Restricted Stock Options/Unvested Stocks/options**

**12. Intellectual Property?**

- a. Patents pending, projects/work in progress

**13. Club Memberships, Season Tickets**

**14. Frequent flyer Miles, points accrued on credit cards, travel sites like Expedia**

**15. Retirement Accounts?**

- a. IRA's
- b. 401(K)s
- c. Pensions
- d. Loans against retirement
- e. Pre-Marital contributions/Post separation Contributions

**16. Other assets?**

- a. Pets
- b. Valuable sporting equipment
- c. Crypto-currency

- d. International accounts/property Holdings
- e. Royalties
- f. Misc.: safety deposit box, collectable coins, art, antiques, other collectables
- g. Cash/Gold and/or precious metals
- h. Lawsuit for lost wages

**17. Debts?**

- a. Credit cards
- b. Loans from Family Members
- c. Student/Parent Loans
- d. Unsecured debt
- e. Pending lawsuit that could result in a debt

**18. Taxes filed and current/Back Taxes Owed?**

- a. Fed
- b. State

**19. Life Insurance?**

- a. Term/Whole Life
- b. Private or employer provided benefit
- c. Eligible to be insured

**20. Health Insurance Coverage?**

- a. Who has what coverage and or coverage options

**21. History of Alcohol/drug addiction that could impact parenting?**

- a. Status/concerns

**22. Other? Active Military/VA Disability Pension**