

ALL IN THE FAMILY

Legal blog on all aspects of Family Law and Divorce in Massachusetts and Rhode Island

# Massachusetts Appeals Court Interprets Coercive Control Statute for the First Time

BY ROBIN M. LYNCH NARDONE • OCTOBER 29, 2026

As described in a previous blog post, in 2024, the Legislature amended the definition of "abuse" in G.L. c. 209A, § 1 to add coercive control. Before that, to obtain a 209A abuse prevention order (restraining order), a person was required to show physical harm or an attempt to cause physical harm, fear of imminent serious physical harm, or forced sexual relations. For the first time, a Massachusetts appellate court has interpreted the state's 2024 addition of coercive control to the statute. In *Kehlani K. v. Tripp T.*, decided October 22, 2026, the Appeals Court affirmed the extension of an abuse prevention order issued under G.L. c. 209A based on coercive control. The decision gives judges, practitioners, and litigants their first appellate guidance on obtaining a 209A order solely on the basis of coercive control.

In *Kehlani K. v. Tripp T.*, the parties had been married for 17 years and were involved in a divorce. The husband resisted the divorce, telling the wife that he was "never, ever leaving," and he later begged her to call off the divorce. In March 2024, the Probate and Family Court granted the wife sole and exclusive use and occupancy of the marital home.

After the March 2024 order, the husband:

- appeared at the home almost daily, parking in the driveway and circling the house on foot, as captured by a doorbell camera;
- blocked the wife's car in the driveway with his car;
- entered the house while the wife was away, including after she changed the locks, and admitted once climbing in through an unlocked window;
- photographed a calendar inside the home that reflected the wife's whereabouts; and
- showed up unannounced where the wife was, including a soccer game, a school, a movie theater in New York, a vacation rental, and a hotel.

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The wife testified that this went on "for months and months," made her concerned for her safety, and left her acutely vigilant. In October 2024, about a month after the law took effect, she filed for a restraining order in the Dedham District Court. The judge extended the order for one year following a hearing at which both parties testified. The husband then appealed.

The Appeals Court held that the wife met her burden of proving that she was suffering from abuse in the form of the husband's coercive control.

In its decision, the Appeals Court provided guidance on the definition of coercive control. The statute defines coercive control as "a pattern of behavior intended to threaten, intimidate, harass, isolate, control, coerce or compel compliance" that causes the family or household member "to reasonably fear physical harm or have a reduced sense of physical safety or autonomy." It lists nine nonexclusive examples, including:

- isolating the person from friends, relatives or other sources of support;
- controlling or monitoring the person's activities, communications, movements, finances, economic resources or access to services; and
- using repeated court actions found by a court not to be warranted by existing law or good faith argument.

The Appeals Court provided guidance on some of the terms within the statute:

**Pattern.** The statute does not define "pattern," so the court used its plain meaning: "[a] mode of behavior or series of acts that are recognizably consistent." The repeated intrusions into the wife's home and her activities met that standard. The court left open whether a minimum number of acts is required.

**Intent.** The husband monitored the wife's activities and movements. The court inferred that he used what he learned to create opportunities to insert himself into her family life and to press her to drop the case and call off the divorce. Direct evidence of intent was not needed; it can be inferred from conduct.

**Reduced sense of safety or autonomy.** The window entry into wife's home, the circling of the house on foot, the blocked driveway, and the tracking of her whereabouts were all reasons the wife reported fearing the husband. This was enough to support a reduced sense of physical safety. Separately, the court found a reduced sense of autonomy, defining autonomy as "an individual's ability to make significant decisions unfettered by concerns that doing so will expose that person to abuse." The husband's behavior caused the wife to have a reduced sense of freedom, integrity, and independence, even when she was in her own home. This was deemed sufficient to show that she has experienced reduced autonomy.

**Reasonably.** The wife was required to prove that her perception of the reduction in her sense of physical safety or autonomy was reasonable. The judge could consider the husband's disregard of the order granting the wife exclusive use and occupancy of the home, his unwillingness to comply with the no-contact provision of the restraining order, and the near-certainty of continued contact, since the parties share three school-age children.

## KEY POINTS

- **No physical violence is required.** The order rested on monitoring, surveillance, and unwanted intrusions into the wife's life, with no allegation of a physical harm.
- **Autonomy is a standalone basis.** A plaintiff can prevail by showing a reasonably reduced sense of autonomy, even without proving fear of physical harm.

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- **Intent can be circumstantial.** Judges may infer the purpose behind a pattern from the conduct itself.
- **Divorce context counts.** Ignoring a Probate and Family Court order giving a party exclusive use and occupancy, and conduct aimed at stopping a divorce, can be evidence of coercive control.
- **Open questions remain.** The court did not decide whether a minimum number of acts is needed.

*Kehlani K. v. Tripp T.* is the first appellate roadmap for coercive control claims in Massachusetts. It confirms that a sustained pattern of monitoring and intrusion, aimed at controlling a partner's decisions, can support a 209A order on its own. The practical lesson is to document the pattern through video footage, photos, dates and locations of unwanted appearances, and any violations of existing court orders.

If you or someone you know is suffering abuse through coercive control, consult with an attorney on ways to protect yourself.

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