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COMMENTS

PARENT MISCONDUCT ON THE SIDELINES: WHO IS LIABLE?

ABIGAIL C. BARNETT*

I. INTRODUCTION

There is a large problem within organized youth sports, and it does not come from the field or the court; it comes from the stands. Over time, there has been an increase in parents of youth athletes letting their tempers get the best of them while spectating their children’s games and practices, leading to fights between parents or even violent shootings of coaches stemming from arguments over something like the score of a game. With many youth sports organizations now requiring parents to agree to abide by their own set of rules to allow their child to participate, one would assume that parents at youth sporting events could follow the rules and behave accordingly; unfortunately, that is not the case in today’s world.

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4 Cook, supra note 1.
When parent misconduct at youth sporting events harms participants or other spectators, who is responsible? To determine whether there is a legal duty to protect spectators, coaches, officials, and athletes against parent misconduct in youth sports, and, if so, who is responsible for preventing parent misbehavior at youth sporting events, this Comment will first analyze the history of parental involvement in youth sports in the United States and how it has evolved into the issue presented today. Next, this Comment will consider the legal precedent of cases that apply to parent misbehavior in youth sports, noting the distinctions in precedent that make the present issue particularly unique as compared to other sports spectator injury cases in the United States. This Comment will then attempt to determine the scope of legal duties owed to protect athletes, coaches, officials, and other spectators against parental misbehavior in youth sports and will propose potential ways to resolve the issue, whether that be through internal policies and procedures, legislative change, or removing spectators entirely. Finally, this Comment will discuss how these possible solutions can be implemented and who should be responsible for enforcing them.

II. HISTORY AND BACKGROUND OF PARENT MISCONDUCT IN YOUTH SPORTS

Though courts differ on who has the duty to protect against parent misconduct in youth sports, failed efforts made by youth sports organizations to reduce the misconduct internally over the years shows that the issue is likely not going to be resolved by the organizations alone.5

A. Development of Parent Misconduct in Youth Sport Organizations

Organized youth sports programs, such as Little League Baseball and Softball, allow children to play sports within a structured, community-based organization.6 Little League organizes teams throughout the world, and is governed at multiple levels.7 Local teams are created through the Charter Committee at Little League International, which also includes Region Centers all over the world.8 Local teams combine to form Districts that are overseen by a District Administrator and their staff.9 As liaisons between Regional Centers and the local Leagues, District Administrators and their staff are responsible for

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2 Who We Are: About Our Organization, LITTLE LEAGUE, https://www.littleleague.org/who-we-are/about/ (last visited Jan. 8, 2024).
3 Id.
4 Id.
5 Id.
6 Id.
ensuring that volunteers are properly trained and that all local teams are in compliance with Little League guidelines.\textsuperscript{10} The local Leagues provide services and ensure the availability of baseball and softball to children in their communities.\textsuperscript{11} Organizations like Little League are important to create a structured environment for children to play the sports they would like; parent misconduct in these organizations hinders these goals.\textsuperscript{12}

The history and background of parent misconduct in organized youth sports goes back to 1939, when Carl Stotz, the Founder of Little League Baseball, would remind “unruly” parents that the game was for their children, not them, and remove them from the stands.\textsuperscript{13} Over time, parent misconduct has grown to be a larger issue; a joint survey by Reuters and Ipsos notes that sixty percent of adults living in the United States have witnessed a parent verbally or physically attacking a coach or official at a children’s sporting event, the highest percentage out of all countries surveyed.\textsuperscript{14}

Parents have begun to treat their children as professional athletes.\textsuperscript{15} John O’Sullivan, the Founder and CEO of the Changing the Game Project, said that “parents are investing so much time and money into their child’s sporting endeavors that they are losing sight of the plot. Instead of going on vacation or out to dinner, parents are treating their child’s sports as a form of entertainment for themselves.”\textsuperscript{16} This has led to parents becoming overly invested in the outcome of youth sporting events.\textsuperscript{17} Unfortunately, this over-investment sometimes leads to parent anger and misconduct.

\textsuperscript{10} Id.
\textsuperscript{11} Id.
\textsuperscript{13} Id. at 277.
\textsuperscript{15} Randi Mazzella, Overzealous Parents are Ruining Youth Sports. It’s Past Time to Sit Quiet and Let the Kids Play, WASH. POST (Mar. 2, 2020, 9:00 AM), https://www.washingtonpost.com/lifestyle/2020/03/02/overzealous-parents-are-ruining-youth-sports-heres-how-do-better/.
\textsuperscript{16} Id.; see also About, CHANGING THE GAME PROJECT, https://changingthegameproject.com/about/ (last visited Oct. 22, 2023) (the Changing the Game Project is an organization created with a mission to “return youth sports to . . . children, and put the ‘play’ back in ‘play ball[,]’” and educate parents of youth athletes).
\textsuperscript{17} Mazzella, supra note 15.
Terms such as “sports rage” and “parental rage” have been coined to describe parents who take out their anger on other adults at sporting events. The reasons for the outbursts and violent behavior from parents vary widely. Some parents want to provide their child with the best opportunities both “for the benefit of the[ir] children as well as for their own sense of parental accomplishment[]” while others have high hopes that ensuring their child has the most playing time will allow them to develop their skill to a level that will earn them a spot on a collegiate and then professional team roster later in life, even though the chances of that happening are slim to none. Whatever the reason may be, the damage done to children and society as a whole by poor parental behavior in youth sports is an issue that has remained and only grown over time.

Youth sports organizations and officials have attempted to regulate parent conduct themselves in many varying forms. For example, Pop Warner, a youth football and cheerleading organization, has a Parent Code of Conduct that lists behavior that is not allowed as the parent of a participant within the organization; Pop Warner’s Code of Conduct specifies that the organization has the authority to impose a penalty on any parent that breaks any of the rules listed in the Code. A girls soccer league in Cleveland started an initiative to keep parents quiet at games, calling it the “movement to end adult chatter.” A youth soccer referee created a Facebook page to publicly shame poor behavior at youth sports events by posting videos of said behavior. Even through all of these efforts, the issue of violent parent behavior remains.

B. State Law and Case Precedent About Youth Sport Organizations’ Potential Liability for Injuries Arising Out of Parent Misconduct

There is not a lot of legal precedent and history regarding the issue of parent behavior in youth sports, but most courts that have reviewed the issue believe
that legislative changes need to be made.28 Traditionally, injuries suffered by
sports spectators occur because of the risks inherent in the game,29 such as being
hit by a foul ball.30 Additionally, violence by parents or others while attending
youth sporting events typically results in criminal charges to those responsible;
for example, a fight that broke out at a youth football game in Hogansville,
Georgia between coaches and parents resulted in two arrests.31 Occasionally,
though, there are times when untraditional cases arise, such as when spectators
sue youth sports organizations for injuries caused by another spectator or the
organization itself,32 or when coaches sue parent-sponsored organizations for
their misbehavior.33

Some state laws provide guidance on who has a legal duty to protect against
poor parent behavior, but these laws mainly provide protections to unpaid
coaches and volunteers within youth organizations,34 with some exceptions
signaling the potential for youth organizations to be liable as an entity.35 Under
Wisconsin law, there is an immunity created, limiting property owner liability
for injuries occurring on land being used for recreational activities.36 However,
under Wis. Stat. Section 895.52(1)(g), “‘Recreational activity’ does not include
any organized team sport activity sponsored by the owner of the property on
which the activity takes place.”37 Therefore, when spectator injuries arise during
youth sporting events held on property owned by the youth sport organization,
liability is not out of the question, a Wisconsin court holding that “the organized
team sport activity exception of Wis. Stat. Section 895.52(1)(g) extends to
spectators whose injuries do not arise out of the team sport activity or out of the

28 Id.
29 David F. Tavella, Duty of Care to Spectators at Sporting Events: A Unified Theory, 5 FLA. A&M U. L. REV.
181, 181 (2010).
30 Id.; Maisonave v. Newark Bears ProFl Baseball Club, Inc., 881 A.2d 700, 702 (N.J. 2005), superseded by
31 2 Arrested After Fight Breaks Out at Youth Football Game in Hogansville, FOX 5 ATLANTA,
32 See Pink v. Rome Youth Hockey Ass’n, Inc., 63 N.E.3d 1148, 1149-1150 (N.Y. 2016); see also Turner v.
34 TEX. CIV. PRAC. & REM. CODE ANN. § 84.004(a) (West 2023); under § 84.004(a), any volunteer in a youth
sports recreational league “is immune from civil liability for any act or omission resulting in death, damage,
or injury if the volunteer was acting in the course and scope of the volunteer’s duties or functions, including
as an officer, director, or trustee within the organization.”
35 TEX. CIV. PRAC. & REM. CODE ANN. § 84.004(e) (West 2023); § 84.004(e) notes that, “[t]he provisions
of this section apply only to the liability of volunteers, and do not apply to the liability of the organization
for acts or omissions of volunteers.”
36 See WIS. STAT. ANN. § 895.52(2) (West 2023).
37 WIS. STAT. ANN. § 895.52(1)(G) (West 2023).
actions of participants in that activity." 38 Other state laws define the consequences involved with violating internal codes of conduct from youth organizations; for example, a New Jersey statute states that “Any . . . parent or other person subject to the terms and conditions of an athletic code of conduct . . . who violates the provisions of the athletic code of conduct, may be banned from attending any subsequent school or community sponsored youth sports event.” 39

Case law also offers some guidance on the issue. In Hills v. Bridgeview Little League Ass'n, the coach of a Little League baseball team was assaulted by assistant coaches and a manager of an opposing team during a Little League baseball tournament. 40 The coach and his wife sued the sponsor for negligence in failing to supervise and control his attackers. 41 In addition to the sponsor as well as his attackers, the coach and his wife sued the host of the tournament for negligence in failing to protect him from the attack. 42 The Court held that the sponsor of the tournament had no duty to control the attackers because of the volunteer relationship between the sponsor and the attackers. 43 The Court also held that the host of the tournament did not have a duty to protect the coach from the attackers because the host's playing field was not open to the general public for business purposes, and the coach did not allege that there was any special relationship between the host and the coach otherwise. 44 The Court explained that the nature of the business on land determines whether there is a special relationship between the landowner and customers or third parties on the land. 45 For example, the Restatement (Second) of Torts Section 344 states that:

> If the place or character of his business, or his past experience, is such that he should reasonably anticipate careless or criminal conduct on the part of third persons, either generally or at some particular time, he may be under a duty to take precautions against it, and to provide a reasonably sufficient number of servants to afford a reasonable protection. 46

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38 Meyer v. Sch. Dist. of Colby, 595 N.W.2d 339, 340-341 (Wis. 1999).
40 Hills v. Bridgeview Little League Ass'n., 745 N.E.2d 1166, 1170 (Ill. 2000), reh'g denied.
41 Id.
42 Id.
43 Id. at 1185-1186.
44 Id. at 1191-1192.
45 Id. at 1188.
46 Hills v. Bridgeview Little League Ass'n., 745 N.E.2d 1166, 1188 (Ill. 2000), reh'g denied (quoting RESTATEMENT (SECOND) OF TORTS § 344, cmt. f, at 226 (1965)).
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The Court followed the Section 344 approach, concluding that it is the majority test for establishing the special relationship between a landowner and third party on the land that can create a duty to protect the third party from third-party attacks.47 Based on the facts here, the Court held that there was no special relationship because the attack took place on the playing field, which was only open to the two teams and the umpires at the time of the game, not the general public.48 Additionally, the Court said that there was “no evidence of record [shown at trial] to support the conclusion that youth coaches and managers in Illinois are, as a group, prone to commit criminal attacks[.]”49 Because of this, in addition to the lack of argument by plaintiff of that conclusion, the Court “decline[d] to impose an affirmative duty to protect upon the hosts of youth athletic events on that basis.”50

In Pink v. Rome Youth Hockey Ass’n, Inc., a youth hockey organization entirely operated by volunteers rented a City-owned arena to host a tournament.51 After one of the games, two spectators got into a fight in the stands and plaintiff, stepping in to try and break up the fight, was injured by the brother of one of the spectators that was fighting.52 Plaintiff sued, among others, the youth hockey association, arguing that the association “owed a duty to protect plaintiff from criminal assault.”53 In addition, plaintiff argued that the youth hockey association was negligent in “failing to enforce the USA Hockey’s ‘Zero Tolerance’ policy,” which requires officials to remove spectators from a game for use of physical violence.54 The Court held that the youth hockey association was entitled to summary judgment.55 First, the Court stated that there is a “‘duty to control the conduct of third persons on their premises when they have the opportunity to control such persons and are reasonably aware of the need for such control’”56 and that this duty includes “‘minimiz[ing] foreseeable dangers on their property’”,57 including “foreseeable criminal conduct.”58 Next, the Court distinguished foreseeability from duty, noting that

47 Id. at 1191.
48 Id.
49 Id. at 1191.
50 Id.
51 Pink, 63 N.E.3d at 1149.
52 Id.
53 Id. at 1150.
54 Id.
55 Id. at 1151.
56 Id. at 1150 (quoting D’Amico v. Christie, 518 N.E.2d 896 (N.Y. 1987)).
58 Id. (quoting Burgos v. Aqueduct Realty Corp., 706 N.E.2d 1163 (N.Y. 1998)).
"Foreseeability merely determines the scope of the duty once the duty is determined to exist" and that "the scope of a duty is defined by past experience and the 'likelihood of conduct on the part of third persons ... which is likely to endanger the safety of the visitor' and 'is limited to risks of harm that are reasonably foreseeable.' Based on this distinction, the Court stated that, although the youth hockey organization "owed a duty to protect spectators from foreseeable criminal conduct, the scope of [the] duty is defined by the likelihood that the aggressive behavior would lead to criminal assault."

The Court continued, stating that the youth hockey organization made efforts to address conduct by players and spectators. Additionally, the Court stated that "the behavior of the fans, however inappropriate, certainly did not create the risk that failure to eject any specific spectator would result in a criminal assault, particularly since such an assault had never happened before." Therefore, the Court said that the assault on the plaintiff was not a "reasonably foreseeable result of any failure [on behalf of the youth hockey organization] to take preventive measures." With regard to the youth hockey organization’s failure to enforce the "Zero Tolerance" policy, the Court stated that "the violation of a[n] [organization]'s internal rules is not negligence in and of itself and where an internal policy exceeds the standard of ordinary care, it cannot serve as a basis for imposing liability." Overall, the court concluded that the youth hockey organization was not liable for negligence in failing to prevent criminal assault to plaintiff because the criminal assault in question was not foreseeable.

As a whole, the legal history and precedent regarding parent misconduct in youth sports is scarce. The statutes and case law that is available appears to give potential liability to youth organizations if the facility in which an injury occurred is owned, rented, or leased by them, and if they are using it for business purposes. However, there could be protections for youth organizations if the

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59 Id. (quoting Maheshwari, 810 N.E.2d 894).
60 Id. (quoting id.).
61 Id. (quoting Sanchez v. State of N.Y., 784 N.E.2d 675, 678 (N.Y. 2002)).
62 Id.
64 Id.
65 Id.
66 Id. (quoting Sherman v. Robinson, 606 N.E.2d 1365, 1369 n.3 (N.Y. 1992)).
67 Id. (quoting Gilson v. Metro. Opera, 841 N.E.2d 747, 749 (N.Y. 2005)).
68 Id.
harm done by a parent was not reasonably foreseeable to the organization. Additionally, even if the youth organization fails to implement an internal policy requiring removal of violent parents or spectators, there could be protection if the policy exceeds “the standard of ordinary care.”

III. ARE YOUTH ORGANIZATIONS LIABLE FOR PARENT MISCONDUCT?

Because the attempts by youth organizations to use internal policies and procedures to stop the misconduct themselves have failed, there is a lack of control over the issue, allowing parental rage to continue. Some state laws allow for misconduct to be eliminated through banning parents from attending events if they have signed a code of conduct through the organization, but these are reactionary measures, and will likely not prevent issues from arising in the first place. When these issues inevitably arise, then, how can a youth organization determine if they will be held liable for the harm caused?

Case law, though scarce, shows that there must be both a duty and a reasonable foreseeability of the specific type of harm at issue present for a youth organization to be liable for parent misconduct. With parent misconduct on the rise over the past few years, it is likely that more and more instances of misconduct could be deemed “foreseeable” by courts, placing responsibility on youth organizations to stop misconduct. Additionally, case law seems to suggest that there is a potential for youth organizations to be liable for parental misconduct and the harm it causes when the youth organization is the owner or lessor of the facility in which the injury occurred, similar to the youth hockey association leasing the arena for the hockey tournament in Pink v. Rome Youth Hockey Ass’n, Inc.

If an injury due to parent misconduct at a youth sporting event occurs at a facility owned or leased by a youth sports organization for business purposes, the likelihood of liability to the youth sports organization increases. “Business purposes” is a broad term; would a select team youth organization hosting a

70 Pink, 63 N.E.3d at 1151.
71 Id. (quoting Gilson v. Metro. Opera, 841 N.E.2d 747, 749 (N.Y. 2005)).
72 Duru, supra note 5, at 40.
74 See e.g., Pink, 63 N.E.3d 1148.
77 Hills, 745 N.E.2d at 1191-1192.
tournament at their facility be considered to be using the facility for business purposes because the youth athletes pay to be a part of the organization? Based on *Hills*, a special relationship can occur even if there is no payment received by the landowner from the entrant to the land, the Court stating that “[i]t makes little sense to base a special relationship that may impose a duty to protect solely on the presence or absence of . . . a tournament entrance fee[.]” Therefore, a spectator or parent attending a youth sporting event or even practice is likely to have the requisite “special relationship” needed for there to be a claim against the landowner or, here, the youth sport organization, provided the youth sport organization rents or owns the facility used for said game or practice.

Additionally, because the Court in *Hills* determined that there is no duty to protect against areas closed to the general public, the determination of whether or not an area where an injury occurred due to parent misconduct is considered to be open to the general public is important when defining the scope of duty to youth organizations who own or rent the land they are playing on. Typically, parents sit on bleachers or chairs in the areas surrounding a court or field when watching youth sporting events. These events usually do not have a list of permitted spectators, and spectators are normally allowed to watch the event and remain anywhere on the youth organization’s property except the field or court and the locker rooms. Therefore, it can be inferred that, unless parent misconduct or injury occurred in one of those areas, as it did in *Hills*, then parent misconduct often arises in areas open to the general public. This suggests a potential duty for youth organizations if spectators, athletes, coaches, or officials are injured by a parent in areas of sporting events open to the general public, with the scope of “general public” seeming to be quite expansive.

*Pink v. Rome Youth Hockey Ass’n, Inc.* was decided in 2016. With parent misconduct only increasing since then, the likelihood of an incident similar to the one in *Pink* giving rise to suit may be much more common today than it was then. Had the case been decided today, the Court may have considered the plaintiff's claims against the youth hockey association to be strong, declaring the assault on plaintiff to be foreseeable and thereby holding the youth hockey association liable for the assault. The factors determining the outcome of cases against youth organizations for parent misconduct is dependent upon the circumstances of the situation, and that includes the frequency of the event in question occurring. Therefore, it is likely that each case will vary depending on the context of the parent misconduct and the frequency of said conduct in the

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78 Id. at 1190.
79 Id. at 1191.
80 See Pink, 63 N.E.3d at 1149.
81 Cook, supra note 1.
geographic location and sport at hand. For example, if incidents of parent misconduct are much more common at football games in Texas than at football games in California, the courts in Texas are more likely to find an event of misconduct to be foreseeable than the courts in California would be. As a whole, future case precedent will likely be inconsistent across the country; this will require close attention to be paid by youth organizations to ensure they know when liability could arise.

Overall, it appears that with the rise in parent misconduct to a likely level of foreseeability, there is a high potential for youth organizations who own or lease the land used for games or practices to be liable for injuries to others due to misconduct by parents. As future litigation ensues, the outcome of cases and new precedent could dissuade youth organizations from wanting to continue operation, lessening the number of opportunities for children to participate in sports. To ensure that youth organizations will continue to operate, there must be specific guidelines set out to be followed, or protections established, for them to avoid liability for parent misconduct. Ideally, though, there would be solutions put in place to stop the misconduct from occurring in the first place.

IV. SOLUTIONS TO PREVENTING PARENT MISCONDUCT IN YOUTH SPORTS

To prevent parent misconduct in youth sports organizations in the United States, some lawmakers have proposed legislation that would target the misconduct directly. A proposed bill in New Jersey would enable prosecutors to file charges against individuals who threaten, harass, or assault coaches, officials, and athletes in youth sports; the bill would impose financial penalties on individuals charged, allow the individuals to be banned from all sporting events for one to four years, and require the individuals to attend training in anger-management. Some people suggest implementing or increasing security and police presence at youth sporting events, however, this would likely lead to the legal dilemma of how much security would be needed and what the legal consequences of not having enough security would look like. Others suggest that parents behaving poorly should lose the ability to watch their children’s

83 Id.
games,\textsuperscript{85} and there are some states that have enacted laws regarding banning parents from youth sports for misconduct,\textsuperscript{86} so this may be a good solution. Some people have also suggested that organizations should have a mediator in the stands to regulate parent conduct.\textsuperscript{87}

Overall, there have been many solutions proposed for how to stop parent misconduct in youth sports. But who should be in charge of enforcing the solution? The possibilities vary widely; states could be responsible by creating laws that allow internal policies to be enforced through state law,\textsuperscript{88} or the responsibility could fall on the organizations to implement the solutions themselves. Either way, for youth organizations to avoid liability, they must ensure that they have policies and procedures in place to ban or disallow potential misconduct from parents. This is a broad umbrella, and a lot of misconduct that could be considered “foreseeable” likely depends on how frequent these types of events occur. In addition, there must be resources made available to implement the proposed solutions; is it feasible for the cost of hiring private security at sporting events to be added to the tabs of underfunded local youth organizations? If not, one of the other proposed solutions may need to be considered.

One of the best starting points would be for all youth organizations to have parental codes of conduct that include language stating the repercussions of misconduct at practices and games. For example, the Texas Select Youth Football League’s “Parents Ethics Code” has a provision stating that “[i]nappropriate behavior is cause for immediate ejection from the stands[,] [a]nd [r]epeat offenses will result in being barred from future games and league sponsored activities.”\textsuperscript{89} This language clearly sets out guidelines for parents and allows for youth organizations to have a signed document to refer to if a parent challenges enforcement of the provision. Having the document would require the organization to monitor spectator behavior closely to ensure they are in compliance with their own rules to avoid a lawsuit by parents who believe the organization is not removing spectators according to their own policy. However,

\textsuperscript{86} See N.J. STAT. ANN. § 5:17-4 (West 2023) (example of a state law that discusses banning parents from youth sports for misconduct).
\textsuperscript{87} Grandstand Staff, Should Parents Be Banned from the Sidelines?, MEDIUM, (July 11, 2018), https://medium.com/grandstandcentral/should-parents-be-banned-from-the-sidelines-81445b0b76ca.
\textsuperscript{88} See N.J. STAT. ANN. § 5:17-4 (West 2023).
the document could be a cost-effective way for organizations to begin to hold parents accountable for their actions.

In addition to parental codes of conduct, requiring parents to attend training prior to their child beginning a sport could be effective for prevention of misconduct up-front. This method is not cost-effective and would not prevent all problems from occurring, but it would show that the youth organization is serious about their policies and could cause some parents to think before they act out at a game or practice. This method is similar to the resources promoted by the Changing the Game Project; the organization provides education and training to parents through various channels, one being an online course called “How to Be a Great Sports Parent.”⁹⁰ Requiring parents to take these sorts of online courses prior to their child beginning practice or play in with an organization could be a step in the right direction to minimizing parent misconduct in youth sports.

V. CONCLUSION

The overarching issue of parent misconduct is a growing concern in the youth sports world and needs to be controlled. The behavior of parents can impact their children’s love for sports and their development as they grow. The legal implications of parent misconduct in sport typically does not fall on coaches and officials, though it may fall on the youth organizations as a whole. Issues of proving foreseeability of spectator misconduct hinder the likelihood of success in these cases, placing the responsibility of change on the shoulders of lawmakers and youth organizations themselves. If youth organizations are not careful, they could find themselves legally responsible for harm caused by parents. Children should be able to participate in youth sports without the worry of their parents creating legal problems. Parents have a great impact on their children, and poor behavior at sporting events could, beyond just embarrassing their children, harm their love for or hinder their development and skill in a sport.