

THE SPECTRUM OF PARENTAL ALIENATION SYNDROME (PART I)

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The Parental Alienation Syndrome, so named by Dr. Richard Gardner, is a distinctive family response to divorce in which the child becomes aligned with one parent and preoccupied with unjustified and / or exaggerated denigration of the other, target parent. In severe cases, the child's once love-bonded relationship with rejected / target parent is destroyed. Testimony on Parental Alienation Syndrome (PAS) in legal proceedings has sparked debate. This two-part article seeks to shed light on the debate by reviewing Gardner's work and that of others on PAS, integrating the concept of PAS with research on high conflict divorce and other related literature. The material is organized under topic headings such as parents who induce alienation, the child in PAS, the target / alienated parent, attorneys on PAS, and evaluation and intervention. Part II begins with the child in PAS. Case vignettes of moderate to severe PAS are presented in both parts, some of which illustrate the consequences for children and families when the system is successfully manipulated by the alienating parent, as well as some difficult but effective interventions implemented by the author, her husband Randy Rand, Ed.D., and other colleagues.

Dr. Richard Gardner was an experienced child and forensic psychiatrist conducting evaluations when, in 1985, he introduced the concept of Parental Alienation Syndrome (PAS) in an article entitled "Recent Trends in Divorce and Custody Litigation" (1). His work with children and families during the 1970s led him to write such books as Boys and Girls Book of Divorce, The Parents Book About Divorce and Psychotherapy with Children of Divorce. He knew from experience that the norm for children of divorce was to continue to love and long for both parents, in spite of the divorce and the passage of years, a finding replicated by one of the first large scale studies of divorce (2). With this background, Gardner became concerned in the early 1980s about the increasing number of divorce children he was seeing who, especially in the course of custody evaluations, presented as preoccupied with denigrating one parent, sometimes to the point of expressing hatred toward a once loved parent. He used the term Parental Alienation Syndrome to refer to the child's symptoms of denigrating and rejecting a previously loved parent in the context of divorce.

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Gardner's focus on PAS as a disturbance of children in divorce is unique, although from the mid-1980s on there has been a proliferation of professional literature on disturbing trends in divorce / custody disputes, including false allegations of abuse to influence the outcome. At least three other divorce syndromes have been identified. In 1986, two psychologists in Michigan, who were as yet unaware of Gardner's work, published the first of several papers on the SAID syndrome, Blush and Ross's acronym for sex abuse allegations in divorce (3). Drawing on their experience doing evaluations for the family court, and the experience of their colleagues at the clinic there, these authors delineated typologies for the falsely accusing parent, the child involved and the accused parent. Two of the divorce syndromes named in the literature focus on the rage and pathology of the alienating or falsely accusing parent. Jacobs in New York and Wallerstein in California published case reports of what they called Medea Syndrome (4, 5). Jacobs discussed Gardner's work on PAS in his 1988 study of a Medea Syndrome mother, as did Turkat when he described Divorce Related Malicious Mother Syndrome in 1994 (6). Fathers, too, can be found with this disorder, as one of the case vignettes below indicates, but for some reason Turkat has not encountered any.

In addition to articles specifically on PAS and literature which refers to it, there is a body of divorce research and clinical writings which, without a name, describe the phenomenon. The literature reviewed here comes from a number of sources including: practitioners who like Gardner are seeking to improve the diagnostic skills and intervention strategies of the courts and other professionals who deal with high conflict divorce; attorneys and judges who come in contact with PAS cases; researchers like Clawar and Rivlin who reference Gardner's work on PAS in their large scale study of parental programming in divorce (7) and Johnston whose work on high conflict divorce (8) led her to study the problem of children who refuse visitation, including a discussion of PAS (9). When PAS is viewed from the standpoint of parts and subprocesses which create the whole, the literature which pertains increases exponentially, for example: psychological characteristics of parents who falsely accuse in divorce / custody disputes; cults who help divorcing parents alienate their children from the other parent; and psychological abuse of children in severe PAS including Munchausen Syndrome by Proxy type abuse.

PAS AND ITS CONTEMPORARY SOCIAL CONTEXT

The trends identified by Gardner and others are the result of important social changes which began to take root and flower around the mid 1970s. The legal treatment of divorce and child custody shifted from the preference for mothers to have sole custody and the “tender years presumption” to the preference for joint custody and “best interests of the child”. This gave divorce fathers more legal options for parenting their children and increased the quantity and intensity of divorce disputes as parents vehemently disagreed over the numerous custodial arrangements now possible. By the late 1970s, rising concern about parental programming of children to influence the outcome of disputes led the American Bar Association Section of Family Law to commission a large scale study of the problem. The results of this 12 year study were published in 1991 in a book called *Children Held Hostage* (7). Clawar and Rivlin found that parental programming was practiced to varying degrees by 80 percent of divorcing parents, with 20 percent of engaging in such behaviors with their children at least once a day. Further discussion of this book appears below.

At the same time as new divorce trends have been emerging, sweeping social changes have been occurring in society's treatment of child abuse. Mandated reporting became the law of the land in the 1970s and the procedures for making reports were simplified such that anonymous reports are now accepted and acted upon in some states. As the number of suspected abuse reports practically doubled, so did the number of false and unsubstantiated reports, according to statistics compiled by the National Center for Child Abuse and Neglect in 1988 which showed that nonvalid reports outnumbered cases of *bona fide* abuse by a ratio of two to one (10).

According to some observers, false allegations of abuse in contested divorce / custody cases have become the ultimate weapon. Judge Stewart wrote that “Family Courts nationwide are feeling the effects of a new fad being used by parties to a custody dispute-the charge that the other parent is molesting the child...The impact of such an allegation on the custody litigation is swift and major... The Family Court judge is apt to cut off the accused's access to the child pending completion of the investigation” (11, p. 329). In response to concerns such as these, the Research Unit of the Association of Family and Conciliation Courts obtained funding for a study on sex abuse accusations in divorce / custody disputes (12). Data for 1985-1986 were gathered from family court sites across the country. At that time, the incidence of sex abuse allegations in divorce was found to average two percent, but varied from one percent to eight percent depending on the court site. Results of this study suggest that sex abuse allegations in divorce may be valid only about 50 percent of the time. Many of the court counselors and administrators interviewed believed they were seeing a greater proportion of such cases than in previous decades.

Ten years later in 1996, Congress amended the Child Abuse Prevention and Treatment Act to eliminate blanket immunity for persons who knowingly make false reports, based on information that 2,000,000 children were involved that year in nonvalid reports, as opposed to 1,000,000 children who were genuinely abused (13). In addition, many states have already enacted laws against willfully making a false child abuse report. In California where the author and her husband practice, the Office of Child Abuse Prevention revised their manual for mandated reporters several years ago to include a section on false allegations in which the coaching of children during custody disputes is described as a major problem and Gardner's work on PAS is referenced (14).

In the meantime, the 1980s saw a massive campaign to train social workers, police, judges and mental health professionals in such concepts as "children don't lie about abuse". To make up for society's blind eye to child abuse in the past, professionals are encouraged to unquestioningly "believe the child" and to reflexively accept all allegations of child abuse as true. Widespread media attention and a proliferation of popular books and movies on child abuse continues to suggest that the problem is widespread and insidious. Parents and professionals alike are enjoined to be vigilant for what are touted as "behavioral indicators" of sex abuse. These include the common but vague symptom of poor self esteem, conflicting "indicators" such as aggressive behavior and social withdrawal, and child behaviors which may be developmentally normal such as sexual curiosity and nightmares. Little attention is paid to the fact that children may develop the same symptoms in response to other stressors, including divorce and father absence.

Children, too, are being sensitized to abuse, taught about "good touch / bad touch". At the end of such a lesson in school, they may be asked to report anyone who they think may have touched them in a bad way. Although some instances of legitimate abuse are detected in this manner, children sometimes misunderstand the lesson such that a kindly grandfather going to scoop up his young grandson in his arms, as he had done many times before, may find the child pulling back from him in horror and accusing him of "bad touch". Adults conducting these classes are sometimes so eager to find abuse that in one Southern state, the parents of over half the class were arrested.

The foregoing outline of recent social changes is not meant to imply that Parental Alienation Syndrome and false allegations of sex abuse in divorce are synonymous. PAS can occur with or without such abuse accusations. Although false allegations of sex abuse are a common spin-off of severe PAS, other derivative false allegations may include physical abuse, neglect, emotional abuse, or a fabricated history of spousal abuse. In addition, there seems to be an increase in PAS type cases of accusations by the alienating parent that it is the alienated parent who is practicing PAS, a tactic which tends to confuse and neutralize interveners.

PARENTAL ALIENATION SYNDROME

According to Gardner, PAS is a disturbance in the child who, in the context of divorce, becomes preoccupied with deprecation and criticism of one parent, which denigration is either unjustified and / or exaggerated. Gardner sees PAS as arising primarily from a combination of parental influence and the child's active contributions to the campaign of denigration, factors which may mutually reinforce one another. Gardner distinguishes between Parental Alienation Syndrome and the term "parental alienation". There are a wide variety of causes for parental alienation, including bonafide parental abuse and / or neglect, as well as significant deficits in a rejected parent's functioning which may not rise to the level of abuse. From Gardner's perspective, a diagnosis of PAS only applies where abuse, neglect and other conduct by the alienated parent which would reasonably justify the alienation are relatively minimal. Thus Gardner conceives of PAS as a specialized subcategory of generic parental alienation. Since introducing the concept of PAS in 1985, Gardner has written two books on the

subject (15, 16), and included a chapter on it in his book entitled *Family Evaluation, in Child Custody Mediation, Arbitration and Litigation* (17).

Depending on the severity of the PAS, a child may exhibit all or only some of the following behaviors. It is the cluster of these symptoms which prompted Gardner to consider them as a syndrome.

- 1) The child is aligned with the alienating parent in a campaign of denigration against the target parent, with the child making active contributions;
- 2) Rationalizations for deprecating the target parent are often weak, frivolous or absurd;
- 3) Animosity toward the rejected parent lacks the ambivalence normal to human relationships;
- 4) The child asserts that the decision to reject the target parent is his or her own, what Gardner calls the "independent thinker" phenomenon; 5) The child reflexively supports the parent with whom he or she is aligned ;
- 5) The child expresses guiltless disregard for the feelings of the target or hated parent;
- 6) Borrowed scenarios are present, i.e., the child's statements reflect themes and terminology of the alienating parent;
- 7) Animosity is spread to the extended family and others associated with the hated parent.

In Gardner's experience, born out by the clinical and research literature reviewed below, mothers are more frequently found to engage in PAS, which is likened by Clawar and Rivlin to **psychological kidnapping** (7). Where PAS with physical child abduction occurs, however, Huntington reports that fathers are in the majority (18). Gardner recognizes that fathers, too, may engage in PAS and gives examples in his books. For consistency and simplicity, though, he refers to the alienating parent as "mother" and target parent as "father."

According to Gardner, the brainwashing component in PAS can be more or less conscious on the part of the programming parent and may be systematic or subtle. The child's active contributions to the campaign of denigration may help to create and maintain a mutually reinforcing feedback loop between the child and the programming parent. The child's contributions notwithstanding, Gardner views the alienating parent as the responsible adult who elicits or transmits a negative set of beliefs about the target parent. The child's loving experiences with the target parent in the past are replaced with a new reality, the negative scenario shared by the programming parent and child which justifies their rejection of the alienated parent. In light of these observations, Gardner warned that children's statements in divorce / custody about rejecting one parent should not be taken at face value and should be evaluated for PAS dynamics. According to psychologist Mary Lund, this insight is one of Gardner's most important contributions because it alerted the legal system, parents and mental health professionals dealing with divorce to an important possibility which can have **disastrous effects if unrecognized** (19).

Gardner emphasizes the importance of differentiating between mild, moderate and severe PAS in determining what court orders and therapeutic interventions to apply. In mild cases, there is some parental programming but visitation is not seriously effected and the child manages to negotiate the transitions without too much difficulty. The child has a reasonably healthy relationship with the programming parent and is usually participating in the campaign of denigration to maintain the primary emotional bond with the preferred parent, usually the mother. PAS in this category can usually be alleviated by the court's affirming that the preferred or primary parent will retain primary custody.

In moderate PAS, there is a significant degree of parental programming, along with significant struggles around visitation. The child often displays difficulties around the transition between homes

but is eventually able to settle down and become benevolently involved with the parent he or she is visiting. The bond between the aligned parent and child is still reasonably healthy, despite their shared conviction that the target parent is somehow despicable. At this level, stronger legal interventions are required and a court ordered PAS therapist is recommended who can monitor visits, make their office available as a visit exchange site, and report to the court regarding failures to implement visitation. The threat of sanctions against the alienating parent may be needed to gain compliance. Failure of the system to apply the appropriate level of court orders and therapeutic interventions in moderate PAS may put the child at risk for developing severe PAS. In some moderate cases, after court-ordered special therapy and sanctions have failed, Gardner states that it may be necessary to seriously consider transferring custody to the allegedly hated parent, assuming that parent is fit. In some situations, this is the only hope of protecting the child from progression to the severe category.



The child in severe PAS is fanatic in his or her hatred of the target parent. The child may refuse to visit, personally make false allegations of abuse, and threaten to run away, commit suicide or homicide if forced to see the father. Mother and child have a pathological bond, often based on shared paranoid fantasies about the father, sometimes to the point of *folie a deux*. In severe PAS, Gardner has found that if the child is allowed to stay with the mother the relationship with the father is doomed and the child develops long-standing psycho pathology and even paranoia. Assuming the target parent is fit, Gardner believes that the only effective remedy in severe PAS is to give custody to the alienated parent. In 1992 he suggested that courts might be more receptive to the change of custody option if the child was provided with a therapeutic transitional placement such as hospitalization, an intervention employed with success by the author and her husband (see case vignette in Part II).



Gardner's original conception of PAS was based on the child's preoccupation with denigration of the target parent. It was not until two years later when he published his first book on PAS that he addressed the problem of PAS with false allegations of abuse. Gardner prefers to view such allegations as derivative of the PAS, observing that they often emerge after other efforts to exclude the target parent have failed. Some of the literature reviewed below, however, indicates that false allegations of abuse may also surface prior to the marital separation, symptomatic of a pre-existing psychiatric disorder of the alienating parent which may not be diagnosed until there is further mental deterioration after the divorce. Gardner was among the first to recognize that involving a child in false allegations of abuse is a form of abuse in itself and indicative of serious problems somewhere in the divorce family system. Insofar as PAS with false allegations of abuse can result in permanent destruction of the child's relationship with the alienated parent, it can be more harmful to the child than if the alleged abuse had actually occurred.

Gardner supports joint custody for those parents who can sincerely agree on it and have the ability to fulfill this ideal. Research by Maccoby and Mnookin suggests that about 29 percent of divorced parents are successfully co-parenting three to four years after filing (20). Gardner opposes imposing joint custody on parents in dispute and between whom there is significant animosity. For these families, Gardner recommends that a thorough evaluation be conducted to develop a case specific plan with the right combination of court orders, mediation, therapeutic interventions, and arbitration.

HIGH CONFLICT DIVORCE AND PAS

High conflict divorce is characterized by intense and / or protracted post separation conflict and hostility between the parents which may be expressed overtly or covertly through ongoing litigation, verbal and physical aggression, and tactics of sabotage and deception. Clinical and research literature suggest that Parental Alienation Syndrome is a distinctive type of high conflict divorce which may require PAS specific interventions, just as the problems of divorced families have been found to

respond to divorce specific interventions rather than to traditional therapies. In their book on children caught in the middle of high conflict divorce, Garrity and Baris treat PAS as a distinctive divorce family dynamic, devoting two chapters to PAS, one on understanding it and the other on a comprehensive intervention model (21).

In high conflict divorce without significant PAS, the parents do most of the fighting while the children manage to go back and forth between homes, maintain their own views and preserve their affection for both parents. They cope by developing active skills for maneuvering the situation or by adopting a survival strategy of treating both parents with equal fairness and distance (8). Periodically, children may exacerbate parental conflicts by embellishing age appropriate separation anxieties, telling each parent things the parent wants to hear and shifting their allegiance back and forth between the parents. Nevertheless, they avoid consistent alignment with one parent against the other and are able to enjoy their time with each parent once the often difficult transition between homes has been accomplished.

In high conflict divorce with significant PAS, the children are personally involved in the parental conflict. Unable to manage the situation so as to preserve an affectionate relationship with both parents, the child takes the side of one parent against the other and participates in the battle as an ally of the alienating parent who is defined as good against the other parent who is viewed as despicable. In a study of 175 children from high conflict families, Johnston found that chronic hostility and protracted litigation between the parents contributed to the development of PAS among older children (9). In other words, where the system is unable to settle and contain parental divorce conflicts, the children may be at increasing risk for developing PAS as they get older. Johnston acknowledges that her findings support Gardner's contention that as many as 90 percent of children involved in protracted custody show symptoms of PAS.

A large scale study of patterns of legal conflict between divorce parents three to four years after filing contained them significant finding that the most hostile divorce couples were not necessarily those engaged in the most contentious legal battles (20). This suggests that PAS may occur not only in the context of litigation but may develop after litigation has ceased, or proceed a new round of litigation after many years, supporting what Dunne and Hedrick found in their clinical study of severe PAS families (22).



According to Johnston, high conflict divorce is the product of a multilayered divorce impasse between the parents (8). Often, the impasse has its roots in one or both parents' extreme vulnerability to issues of narcissistic injury, loss, anger and control.

These vulnerabilities prevent a satisfactory divorce adjustment and feed an endless, sometimes escalating cycle of action and reaction which promotes and maintains parental conflict. The parents are frozen in transition, psychologically neither married, separated or divorced, a pattern which may pertain even when only one parent is significantly disturbed. Using Johnston's model, PAS can be viewed as an effort by one parent, with the help of the children, to "resolve" the divorce impasse with a clear-cut understanding of who is good, who is to blame and how the parent to blame should be punished. The following vignette illustrates this. Like the other case examples interspersed throughout this article, it is a composite scenario synthesized from real cases encountered by the author and her colleagues.

Mr. L had adopted his wife's child from her previous marriage and he and Mrs. L. had a child of their own, a girl who was six years old when Mr. L. moved out of the family home. During the six months leading up to this precipitous event, Mrs. L. was living in one part of the house with the older child while Mr. L. and his daughter had rooms together in a separate part of the house. The parents hardly

spoke to one another but the children visited back and forth freely with each other and with both parents. Under the circumstances, Mr. L. did not think his wife would object to his leaving, but just in case there was a scene he decided to move out first and then work out the practical issues with Mrs. L. He left a letter for her and another one for the children, explaining his decision and affirming his desire to make arrangements for visitation and child support. Mrs. L. was furious. She immediately had the locks changed and successfully blocked her husband's efforts to contact the children by phone or to see them. Both children probably felt betrayed by father and Mrs. L. amplified such feelings by telling the children their father had abandoned them and did not care about them at all. She also alleged that he had had numerous affairs during the marriage although Mr. L. always denied that. These allegations may have sprung from the fact that Mrs. L. found out six weeks after her husband left that he was dating someone. Outraged, she told Mr. L. that he would never see the children again. She and the children began calling Mr. L. and his girlfriend at all hours, screaming accusations and obscenities over the phone until a restraining order was obtained. When efforts by father's attorney to arrange for mediation between Mr. and Mrs. L. were stonewalled, Mr. L. got a court order for visitation. Three months had passed when his first opportunity to see his children since moving out was scheduled.

On the eve of this visit, Mrs. L. called child protective services and accused Mr. L. of sexually molesting their daughter. According to the social worker's notes which were obtained during subsequent litigation, Mrs. L. told the social worker that she "knew" while she and her husband were still living together that he was molesting their daughter.

The family law judge ordered a custody evaluation which was very thorough and took months to complete. The evaluator documented a number of instances in which the girl's statements about abuse and hating her father seemed to be strongly influenced by mother's overwhelming anger and that of the older half sibling, who was strongly aligned with the mother. Mrs. L. was diagnosed with a severe narcissistic personality disorder with antisocial features, while Mr. L. was seen by the evaluator as rather passive by comparison and as ambivalent and conflict avoidant. The evaluator was able to hold one meeting with father and daughter together, during which their loving attachment to one another was apparent. This was the little girl's first opportunity to talk to her father about the feelings engendered by his leaving. As it turned out, it was also her last opportunity. The PAS intensified such that efforts to convene further father / daughter sessions failed when the child threw tantrums in the waiting room and ran screaming into the parking lot where her mother was waiting.

Seven months after the marital separation, the custody evaluator's report was released. It stated that the alleged abuse had in all probability not occurred but failed to diagnose severe PAS with false allegations of abuse. The evaluator recommended that the mother retain primary custody and that the girl and her parents each become involved in individual therapy to facilitate father / daughter reunification. Not surprisingly, Mrs. L. arranged for the child to see a therapist / intern who never saw the custody evaluator's report. Based on input from the mother alone, the therapist treated the girl for abuse by her father instead of providing divorce specific therapy aimed at helping the little girl to adjust to her parent's divorce and to establish a post divorce relationship with her father. The girl's anger at her father became more extreme with each passing month and defeated the visitations planned by the family mediation center. Finally, a year after the separation, the custody evaluator was prepared to testify as to the PAS and to make the strong recommendations needed to remedy the situation.

By that time, the father was convinced that nobody could do anything about his daughter's continued expressions of hatred toward him. He also felt daunted by the prospect of further litigation and an even greater financial drain. He decided to let go, hoping that one day when his daughter was older she would understand and seek him out.

CHILDREN HELD HOSTAGE: DEALING WITH PROGRAMMED AND BRAINWASHED CHILDREN

By the late 1970s, judges, parents, and mental health professionals involved with divorce were so concerned about parental programming that the American Bar Association Section on Family Law commissioned this 12 year study of 700 divorce families (7). Clawar and Rivlin found that the problem of parental programming was indeed widespread and that even at low levels it had significant impact on children. Data from multiple sources was analyzed including: written records such as court transcripts, forensic reports, therapy notes and children's diaries; audio and video tapes of interactions between children, their parents and others related to the case; direct observations, such as children with parents and clients with attorneys; and interviews with children, relatives, family friends, mental health professionals, school personnel, judges and conciliators.

Gardner's work on PAS is referenced at the beginning of Clawar and Rivlin's book (7), but the authors take issue with what they represent as his position, that less severe cases need not be a cause of great concern. They found that PAS can result from a variety of complex processes, whether or not one parent engages in a systematic programming campaign and whether or not alienation is the programming parent's goal. Parental alienation is only one of a number of detrimental effects. According to this study, even well meaning parents often attempt to influence what their children say in the custody and visitation proceedings. Mild levels of parental programming and brainwashing seem to have significant effects.

Clawar and Rivlin anchor their work in 30 years of literature on social psychology and the processes of social influence, variously referred to in the literature as thought reform, brainwashing, indoctrination, modeling, mimicking, mind control, re-education, and coercive persuasion. These terms describe a variety of psychological methods for ridding people of ideas which authorities do not want them to have and for replacing old ways of thinking and behavior with new ones. For the purposes of research, Clawar and Rivlin ascertained the need for more precisely defined terminology. They selected the words "programming" and "brainwashing". They defined "program" as the content, themes, and beliefs transmitted by the programming parent to the child regarding the other parent.

"Brainwashing" was defined as the interactional process by which the child was persuaded to accept and elaborate on the program. Brainwashing occurs over time and involves repetition of the program, or code words referring to the program, until the subject responds with attitudinal and behavioral compliance.

According to Clawar and Rivlin, the influence of a programming parent can be conscious and willful or unconscious and unintentional. It can be obvious or subtle, with rewards for compliance that were material, social or psychological. Noncompliance may be met with subtle psychological punishment such as withdrawal of love or direct corporal punishment, as illustrated in the case vignette of S in Part II. The author encountered another case in which the alienating mother handcuffed her son to the bedpost when he was 12 years old and the boy asserted he was not willing to continue saying his father had physically abused him. The Clawar and Rivlin study found that children may be active or passive participants in the alienation process. As the case of the 12- year-old boy suggests, the nature and degree of the child's involvement in the PAS may change over time.

This study identifies the influential role of other people in the child's life, such as relatives and professionals aligned with the alienating parent, whose endorsement of the program advances the brainwashing process. In a general way, these findings appear to replicate Johnston's research on high conflict divorce which identified the importance of third party participants in parental conflicts (8). Rand noted the influence of so-called "professional participants in Munchausen Syndrome by Proxy type abuse which in divorce can overlap with PAS" (23).

Clawar and Rivlin identify eight stages of the programming / brainwashing process which culminates in severe Parental Alienation Syndrome (7). Recognizing the power imbalance between parent and child, they view the process as driven by the alienating parent who induces the child's compliance on step by step basis:

- 1) A thematic focus to be shared by the programming parent and child emerges or is chosen. This may be tied to a more or less formal ideology relating to the family, religion, or ethnicity;
- 2) A sense of support and connection to the programming parent is created;
- 3) Feeling of sympathy for the programming parent is induced;
- 4) The child begins to show signs of compliance, such as expressing fear of visiting the target parent or refusing to talk to that parent on the phone;
- 5) The programming parent tests the child's compliance, for example, asking the child questions after a visit and rewarding the child for "correct" answers;
- 6) The programming parent tests the child's loyalty by having the child express views and attitudes which suggest a preference for one parent over the other;
- 7) Escalation / intensification / generalization occurs, for example, broadening the program with embellished or new allegations; the child rejects the target parent in a global, unambivalent fashion;
- 8) The program is maintained along with the child's compliance, which may range from minor reminders and suggestions to intense pressure, depending on court activity and the child's frame of mind.

CLINICAL STUDIES OF PAS

According to Gardner and seconded by Cartwright, Parental Alienation Syndrome is a developing concept which clinical and forensic practitioners will refine and redefine as new cases with different features become better understood (24). This section reviews the work of practitioners who, like Cartwright, seek to elaborate on Gardner's work by contributing their own knowledge and experience from work with moderate to severe PAS cases.

Dunne and Hedrick

Practicing in Seattle, Washington, Dunne and Hedrick analyzed sixteen families who met Gardner's criteria for severe PAS (22). Although the cases show a wide diversity of characteristics, the authors found Gardner's criteria useful in differentiating these cases from other post-divorce difficulties, lending support for the idea that PAS has distinctive features which differentiate it from other forms of high conflict divorce. Among the severe PAS cases examined, some involved false allegations of abuse and some did not. Children in the same family sometimes responded to the divorce with opposing adjustments. For example, the oldest child in one family, a 16-year-old girl, aligned with her alienating mother while her 12-year-old brother's desire for a relationship with his father led to the mother finally rejecting the boy.

In another case, failed separation between mother and daughter, age 4 at the time of the marital break up, was shown to contribute to an escalating pattern of the girl rejecting her father. The onset of PAS in a given family was found to occur before the parents separated, during the actual divorce proceedings, or years after the divorce decree. Dunne and Hedrick describe a two-and-a-half year-old girl whose parents were disputing custody where there had been a long series of allegations by the mother since the early months of her pregnancy. Some of the teens in this sample had enjoyed a lengthy and positive post-divorce relationship with a parent prior to rejecting that parent as part of a PAS scenario.

Lund

Psychologist Mary Lund examined factors in addition to parental programming which can contribute to estrangement between the child and a rejected parent (19). She wrote that the methods Gardner advocates, such as court orders for continued contact, fit many cases and may help prevent the child developing the kind of phobic-like reaction to the rejected parent which can occur when contact is discontinued during long, drawn out legal proceedings. Such legal interventions often form the cornerstone for treatment. In treating these families, Lund integrates Gardner's work with that of Janet Johnston. She assesses the family in terms of developmental factors in the child which may be contributing, such as normal separation problems among pre-schoolers and oppositional behavior during preadolescence and adolescence. Deficits in the noncustodial parent's parenting may also contribute to the problem. In her experience, the hated parent, usually the father, often has a distant, rigid, even authoritarian style which contrasts with the indulgent, clinging style of the loved parent, who may also need help with appropriate parenting. These are risky generalizations, however. In the experience of this author and others, alienating and target parents exhibit a wide variety of personality patterns which do not lend themselves to this type of generalization. In addition, where the father is the alienating parent, it is sometimes he who uses an overindulgent and materially lavish parenting style to overwhelm and override the children's healthier psychological bond with the mother.

According to Lund, PAS may also develop when the stress for the child of ongoing high conflict divorce becomes too much and the child seeks to "escape" being caught in the middle by aligning with one parent. Therapists, especially individual child therapists, can unwittingly become part of the system maintaining the PAS, such that a court order is required to break up the therapist's polarizing influence. Ultimately, a combination of strategic legal and therapeutic interventions are required to mitigate the PAS and keep the case manageable.

Cartwright

A Canadian psychologist, Cartwright makes eight points about PAS:

- 1) PAS can be provoked by conflicts other than custody matters, e.g., child support and relatively trivial differences;
- 2) alienation is a gradual and consistent process that is directly related to the time spent alienating;
- 3) time is on the side of the alienating parent, who may engage in a host of delay tactics;
- 4) slow judgments by courts exacerbate the problem;
- 5) alienating parents sometimes use the hint of sexual abuse to discredit the other parent, what Cartwright calls "virtual" allegations of sexual abuse;
- 6) judgments by the court which are clear and forceful are required to counter the force of alienation;
- 7) children subject to excessive alienation may develop mental illness and
- 8) successful parental alienation has profound, long term consequences for the child and other family members which are only beginning to be appreciated (24).

As an example of "virtual" allegations abuse, Cartwright describes a mother who insinuated sexual abuse by the father by alleging that he had shown the child a pornographic videotape which in fact was just a Hollywood comedy rented from a family video store. Regarding risk to the child of developing mental illness,

Cartwright gives the example of disintegrating behavior by an alienated son, presumably latency age, who tried to poison his father by slipping air freshener into his stomach medicine. Later, the boy ran away during a visit with the father and the police had to be called. The *folie a deux* literature includes a report in 1977 of a 10-year-old boy who allegedly attempted to burn down his father's house two years after his parents divorced, apparently as a result of his *folie a deux* relationship with his

disturbed mother (25). Such cases suggest that severe PAS can be indicative of significant emotional disturbance in the alienating parent with a proportionately disturbing effect on the child.

Cartwright poignantly describes the psychological effects on the child of being involved in severe PAS. "The child...experiences a great loss, the magnitude of which is akin to death of a parent, two grandparents, and all the lost parent's relatives and friends...Moreover...the child is unable to acknowledge the loss, much less mourn it" (24). The child's good memories of the alienated parent are systematically destroyed and the child misses out on the day-to-day interaction, learning, support and love which, in an intact family, usually flows between the child and both parents, as well as grandparents and other relatives on both sides.

The child may encounter insurmountable obstacles if, later in life, he or she seeks to reestablish relations with the lost parent and his family. The lost parent may be unable or unwilling to become reinvolved. The parent or grandparents may have died. Some of these children eventually turn against the alienating parent, and if the target parent is lost to them as well, the child is left with an unfillable void.

PARENTS WHO INDUCE ALIENATION

Gender

Gardner's observation that mothers seem to engage in PAS behavior with significantly greater frequency than fathers is born out by divorce research, as well as by the clinical PAS literature. The California Children of Divorce Study found that in a nonclinical sample, mothers were twice as likely as fathers to form PAS type alignments with their children (2). When false allegations of abuse arise, as in more severe manifestations of PAS, mothers also seem to comprise the majority (3, 26-28). Mothers constituted 67 percent of the accusers in the nationwide study which revealed that allegations of abuse in divorce / custody disputes were found to be invalid about 50 percent of the time (12). Fathers were the accusers in 22 percent of cases while third parties such as relatives and professionals were the adult initiators 11 percent of the time. Where a third party was the initiator of the allegation, a parent might also believe there was abuse. The numbers reverse when it comes to physically abducting the child, with fathers the abductors from 60 percent to 70 percent of the time (18). There may be gender differences in how men and women go about gaining control of their children and taking revenge on an ex-spouse, with men more inclined to physical kidnapping and women more inclined to social / psychological abduction, which is how Clawar and Rivlin characterized severe PAS (7).

Never Married

Parents may engage in PAS behavior even if they were never married. In Johnston's study of children who refuse visitation, she found that from 6 percent to 15 percent of the high conflict parents she studied were not married (9). In the author's experience, one of the contributing factors to PAS with some of these couples is the mother's anger and resentment over the father's refusal to marry her, an effect which is exacerbated if the father becomes involved with a new partner. A mother in this position may have particularly strong proprietary feelings, similar to what Clawar and Rivlin describe (7), infuriated by the unfairness of joint custody laws which grant the father rights to a relationship with his child without his having fulfilled his obligations with respect to the mother.

New Partners

Johnston found that the new partner of either parent could be the primary instigator of efforts to gain custody of the child (8). Something similar happens when a divorcing parent joins a cult which

actively strives to get the child from the noncult member parent, with the cult fulfilling the role of new partner in a sense, as shown in one of the case vignettes to follow.

Narcissistic Vulnerability



Johnston found that to varying degrees, one or both of the parents in high conflict divorce may be narcissistically vulnerable, lacking a well-established self identify and relying on primitive defenses such as externalization, denial and projection (8). The need of one or both parents to protect and defend themselves against narcissistic injury is at the root of many high conflict divorces. This may be a motivating factor for PAS in some cases, a dynamic described by Wilhelm Reich almost 50 years ago (29) when he foretold how parents of certain character types would seek to defend themselves against narcissistic injury in divorce by fighting for the child, using the technique of defaming the partner in order to *alienate* the child from that parent (*italics added*).

Need to Conceal Parental Deficits

According to Clawar and Rivlin, the campaign to alienate the child from the other parent is sometimes used to deflect unwanted scrutiny of the programming parent's personal problems, for example alcohol, drugs, neglectful parenting, physical and sexual abuse, criminal involvement, or socially unaccepted life-style (7). Sometimes parents engage in PAS behavior out of fear that they will be found wanting when compared to the more loving and capable target. The literature on false allegations in divorce / custody disputes often makes the point that the accusation helps the accuser level the playing field, so to speak.

Vulnerability to Separation and Loss



A factor in some high conflict divorces is the presence in one or both parents of specific underlying vulnerabilities to loss and conflicts around attachment and separation (8). A PAS scenario can develop when a troubled parent who was rejected in the divorce copes with loss and loneliness by turning to the child to fulfill emotional needs, resulting in what Wallerstein calls the "overburdened child", discussed in Part II. For some parents, the divorce reactivates separation issues from earlier losses such as previous divorce, kidnapping or death of a child, or the loss of other family members. Such a parent may engage in PAS to defend against further "loss," that of having to share the child with the other parent. Some parents have long standing personality problems with separation and individuation. The ongoing conflicts over the child engendered by PAS help ward off feelings of loss and abandonment by maintaining the relationship with the ex-spouse. PAS can also be used by keep the other parent hostily engaged, as in Medea Syndrome (4, 5) and Divorce Related Malicious Mother Syndrome (6, 30).

Revenge Clawar and Rivlin found that revenge was one of the most common and powerful reasons for parents to engage in alienating behavior (7). The personality makeup of some parents is such that revenge seems like their only viable option in response to feeling wounded by the divorce. The desire for revenge can be further kindled if infidelity is discovered, the alienating parent is left for someone else, or finds themselves immediately replaced by a new love object in the life of the parent who left.

Need for Control and Domination

Some alienating parents are driven by overriding needs for power, influence, domination and control (7). Engaging in PAS may provide the dual gratification of maintaining power, influence and control over the child and vicariously over the ex-spouse whose visitation and relationship with the child is frustrated by the alienating parent's control maneuvers. Needs for domination and control are

sometimes acted out by abducting the child and using it to taunt and torment the frantic target parent. In addition to mothers and fathers, a new partner can be the one with inordinate needs for power, domination and control. For example, a mother may become involved with a new partner who first seduces her away from her relatively weak husband and then acts as a sort of one-on-one cult leader to mother and child, who are both programmed and brainwashed into compliance and submission.

Medea Syndrome

The need for revenge is taken to an extreme in Media Syndrome (4, 5). "Modern Medeas do not want to kill their children, but they do want revenge on their former wives or husbands-and they exact it by destroying the relationship between the other parent and the child...The Medea syndrome has its beginnings in the failing marriage and separation, when parents sometimes lose sight of the fact that their children have separate needs [and] begin to think of the child as being an extension of the self...A child may be used as an agent of revenge against the other parent...or the anger can lead to child stealing" (5). The "embittered- chaotic" parents described earlier by Wallerstein and Kelly may also fall in the revenge category (2). These parents act out their intense anger in a disorganized but chronically disruptive way which bombards the children, rather than protecting them, with the raw bitterness and chaos of the angry parent's feelings about the ex-spouse and the divorce.

Divorce Related Malicious Mother Syndrome

Turkat would have done better to call this disorder "Malicious Parent Syndrome," but be that as it may, this disorder describes a special class of alienating parents who engage in a relentless and multifaceted campaign of aggression and deception against the ex-spouse, who is being punished for the divorce (6, 30). Contrary to Turkat, the author has encountered several cases in which the father was the malicious parent, as illustrated in the case vignette at the end of this section. Discussing PAS by name, Turkat classified PAS as a moderate form of visitation interference as compared with Divorce Related Malicious Mother Syndrome. The parent with the latter disorder uses an array of tactics including excessive litigation, alienating the child from the target parent, and involving the child and third parties in malicious actions against the ex-spouse. Lying and deception are routinely used. A malicious parent might arrange to have the ex-spouse investigated for use of illegal drugs at work or file a complaint with authorities against the ex-spouse's new partner. Malicious parents are often successful in using the law to punish and harass the ex-spouse, sometimes violating the law themselves but often getting away with it. Their efforts to interfere with the target parent's visitation are persistent and pervasive, including attempts to block the target parent from having regular, uninterrupted visitation with the child and from having telephone contact, as well as trying to block the target parent from participating in the child's school life and activities.



Mr. C's suspiciousness and verbal attacks on his wife finally drove her to file for divorce. As on previous occasions, Mr. C. threatened that if she would not reconcile he would win custody of their four-year-old daughter and make sure the mother never saw her again. In the past, Mrs.

C. had relented, fearful that Mr. C. would fulfill his threats, but this time she stood firm. Mr. C. filed for sole custody based on false allegations that the mother was unfit. When these allegations were not upheld, the father made up new ones. Within a year of filing, Mrs. C. became engaged to another man. Mr. C. succeeded in breaking up the engagement by accusing the fiance of sexually abusing the child. He had the police arrest the fiance at the mother's home. When child protective services informed the mother that they would take her daughter away for failure to protect, the mother canceled her engagement, terrified that Mr. C. would make good on his threat to take her daughter away. When police and child protection investigation of the sex abuse allegations resulted in a finding that no abuse occurred, Mrs. C. proceeded with her wedding plans. Father raised allegations

of sex abuse against Mrs. C.'s new husband in family court and succeeded at one point in gaining temporary custody. Primary custody was returned to the mother after the court ordered evaluation found the allegations to be without merit and the father to be emotionally disturbed and pressuring the child to report abuse. During his visitation time, the father and a male friend continued to interrogate the girl about abuse by the stepfather and as time went by she felt increasingly pressured to meet their expectations. Away from the father's influence, however, the girl enjoyed her family with her mother and stepfather. She stated to several different therapists that she had only accused her stepfather of molesting her to please her father and his friend.

In the meantime, Mr. C. and friend continued to make abuse reports against the stepfather, creating significant distress for Mrs. C., her new husband and the child. Eventually, when the girl was 10, the father succeeded in getting the juvenile court to take jurisdiction and give him custody, although medical examination of the child did not support the increasingly serious accusations. Mrs. C. was not allowed to see her daughter. When she tried to contact the therapist who was now seeing the girl for sex abuse by Mrs. C.'s new husband, the therapist was rude and refused to speak with her. The mother was tortured by reports from a series of child protection workers which indicated that her daughter was acting out in bizarre and often self-destructive ways. At the age of twelve, she was picked up by the police for prostitution and had to be psychiatrically hospitalized. Several professionals who were involved when the mother had custody wondered if Mr. C. was deliberately destroying his daughter so as to get revenge against the mother. Mr. C. was able to retain custody, however, by focusing the attention of authorities on allegations of sex abuse against the stepfather.

Long before Divorce Related Malicious Mother Syndrome was identified by Turkat, a male psychologist, whose ex-wife undoubtedly exhibited the disorder, wrote a book about his ordeal (31). Accusing him of sexually abusing their young daughter, the mother arranged for the police to arrest him at his office in front of his clients and staff. She also arranged for newspaper reporters to be present so that pictures of the shocked psychologist being handcuffed and hauled off to jail were widely broadcast. The father fought back and eventually obtained joint custody after the court found that mother's extreme efforts to sever the father's relationship with his child were detrimental and stripped her of sole custody.

Personality Characteristics of Parents Making False Accusations of Sexual Abuse in Disputes

Wakefield and Underwager undertook a systematic review of divorce / custody case files to examine and compare the characteristics of 72 false accusers, 103 falsely accused parents and a control group of 67 parents disputing custody but without allegations of abuse (28). Criteria for determining whether a parent had falsely accused included a finding by the justice system that there had been no abuse. Of the three groups, the falsely accusing parents were much more likely to have been diagnosed by a professional as exhibiting a personality disorder including mixed, unspecified, histrionic, borderline, passive-aggressive or paranoid. Approximately one-fourth of the false accusers did not exhibit significant pathology, while most of the parents who were disputing custody without abuse allegations were assessed as normal. Some of the false accusers were so obsessed with anger toward their estranged spouses that this became a major focus of their lives. They continued to be obsessed with abuse despite negative findings by mental health professionals and the courts, similar to what is found in cases of delusional disorder and Munchausen Syndrome by Proxy. The relationship of falsely accusing parents with their children was often characterized in the record as extremely controlling and symbiotic. Two were given a formal diagnosis of *folie a deux* between parent and child. Several exhibited extremely serious dysfunction, such as unpredictable bizarre behavior, belief that they possessed supernatural powers and delusions of grandeur. These authors found more similarities than differences between mothers and fathers who falsely accused, with mothers very much in the majority.

SAID Syndrome

Blush and Ross have come up with three psychological profiles for mother false accusers and a typical profile of father accusers (3, 26, 27). Mothers tend to present as "fearful victim," "justified vindicator," or to some degree psychotic. The "fearful victim" presentation involves manipulation of social image around a specific theme to which others respond with sympathy and support, such as child abuse or spousal abuse. The "justified vindicators" initially present as intellectually organized with a knowledgeable, even pseudo-scientific sounding agenda, similar to what Clawar and Rivlin report regarding self righteousness as an important motivation of some programming parents. Women in the third group present with a combination of borderline and histrionic features, which interact with the stress of the divorce to impair the mother's reality testing and significantly interfere with her functioning, sometimes to the point of a psychotic or quasi-psychotic presentation. Similar to Wakefield and Underwager's findings (28), mothers in all three categories tend to be histrionic in presentation, so emotionally convinced of the "facts" that no amount of input, including from neutral professionals, can dissuade them from their perceptions. According to Blush and Ross, the typical profile for father accusers is one of intellectual rigidity and a high need to be "correct," possibly male counterparts of the "justified vindicator" presentation among mothers. By history, these men were hypercritical of their wives while the marriage was still intact, quick to suspect them of negligence and to accuse their wives of being unfit mothers. Gardner's work is referenced in the second and third SAID syndrome articles by these authors (26, 27).

Accuser and Accused Dyads

Important information about a programming parent using false allegations of abuse is to be found in the particular choice of accused. The study reported by Thoennes and Tjaden showed that the battle goes beyond simply mothers against fathers and vice versa (12). Parents were found to accuse not only each other but the other's new partner, or relatives such as grandparents or the new partner's teenage son. A parent who accuses the ex-spouse's new partner may fulfill a number of goals simultaneously, expressing feelings of jealousy, revenge, and trying to keep the child from forming a positive attachment with the new parent figure. Accusations against the target parent's relatives may provide a combination of revenge, allegations that are difficult for the ex-spouse to defend since they are not directly against him or her, and a means to exclude the relatives from post-divorce involvement in the child's life. The accuser can set up a devastating conflict for the target parent by accusing his teenage son from a previous marriage or the new partner's teenage offspring from a previous union. This has the effect of forcing the target parent to "choose" between his child involved in making the allegation and another child whom he loves and is responsible for. This enhances the alienating parent's ability to convince the child that daddy does not care.

The Delusional Parent

Rogers refers to PAS in her report on five divorce / custody cases in which the falsely accusing parent, all mothers in this sample, suffered from delusional disorder (32). The children were subjected to undue influence to get them to accept the accusing parent's psychotic belief and concomitant rejection of the other parent in a severe PAS scenario. Where the child succumbed, a diagnosis of shared paranoid disorder, otherwise known as *folie a deux* might also be made. According to Rogers, the first stages of the mother's delusional disorder were present to some degree during the marriage and exacerbated parental conflicts prior to the separation. However, these subtle signs were not immediately discernible as a psychiatric illness and were only recognized in retrospect, as the mother's symptoms became worse in the course of the divorce and its attendant disputes. One of the severe PAS cases reported by Dunne and Hedrick appears to be an example of the mother developing delusional disorder. The "subtle signs" were expressed as suspicions during

her pregnancy that the father would molest the child, similar to a case encountered by the present author in which suspicions harbored by the mother even before the child was born prompted her to abduct the child a few months later. According to Rogers, the mothers who became delusional were usually the main caretakers for the children. In two cases they were awarded custody during the first round of custody litigation, before more noticeable deterioration in their parenting capabilities had occurred. With continued custody litigation, the intractable nature of their mental illness became apparent and the court gave custody to the father in four of the five cases.

Munchausen Syndrome by Proxy

Some cases of PAS, especially those with false allegations of abuse, may have important features in common with Munchausen Syndrome by Proxy (MSP) in which parents fulfill their needs vicariously by presenting their child as ill (23). In cases of "classical" MSP, parents repeatedly take their children to doctors for unnecessary, often painful tests and treatments which the physician is induced to provide based on the parent's misrepresentations. "Contemporary-type" MSP occurs when a parent fabricates an abuse scenario for the child and welcomes or actively seeks out repeated abuse interviews of the child by police, social workers and therapists (23). The concept of contemporary-type MSP elaborates on the idea put forth by Sinanan and Houghton that new types of MSP behavior will evolve in parallel with the evolution of new medical and social services, e.g., the child protection system (33). MSP parents may change or come up with new "symptoms" for the child so as to better elicit the desired response from a particular care provider or an institution offering specialized services. Thus, the same child may be receiving attention simultaneously for fabricated physical symptoms from several medical providers and for fabricated sex abuse from therapists and public agencies who specialize in abuse. Careful evaluation and thorough investigation of sex abuse allegations which turn out to be questionable or false will sometimes bring a parent to the attention of authorities for practicing "classical" as well as "contemporary-type" MSP (34).

As with PAS, MSP is most often practiced by mothers, although fathers and other caretakers are sometimes found to engage in the behavior. MSP parents maintain their psychic equilibrium through control and manipulation of external sources of social gratification, including the child and care providers who serve children. Medical and other care providers are sometimes referred to as the "third party participants" in the MSP, because of their importance in carrying out the parent's agenda, including false allegations of abuse. There are at least four different presentations where MSP and PAS overlap: 1) an MSP mother may, during the marriage, add false allegations of abuse to the child's fabricated physical symptoms, thus precipitating the divorce; 2) where the MSP parent feels angry or rejected in divorce, manipulating the child's medical care and involving the child in false allegations of abuse may serve multiple functions including revenge, maintaining the symbiotic bond with the child and preserving the freedom to continue the MSP behavior; 3) a parent dealing with the losses and stress of divorce may respond with MSP type behavior to obtain social support from the child and care providers; 4) an alienating parent may exhibit MSP type behavior by manipulating the child's medical care for the primary purpose of furthering the alienation agenda (35).

In PAS with features of MSP, the alienating parent may gain legal authority to control and determine whom the child sees and what treatment is given. The child may be taken to the doctor after visits with the target parent for fabricated or induced symptoms which are attributed to abuse and neglect by the other parent. The child is likely present while the alienating parent makes this negative presentation about the other parent to the doctor, who inadvertently lends support to the denigrating account by listening to it, asking questions and examining the child. The target parent may be rendered ineffective to stop this cycle because providers retained by the alienating parent, and who take her assertions at face value, often refuse to talk to the target parent or allow the target parent access to child's medical records. The result for the child is what Rand calls MSP *type* abuse. Rand



expands Meadow's formulation of MSP as a complex form of emotional abuse by applying Garbarino's five types of psychological maltreatment. Research on MSP shows that it sometimes overlaps with other forms of abuse and neglect (36).

Parental Child Abductors

According to Huntington, post-divorce parental child stealing has been on the increase since the mid-1970s, paralleling the rising divorce rate and the explosion of litigation over child custody (18). An abducting parent views the child's needs as secondary to the parental agenda which is to provoke, agitate, control, attack or psychologically torture the other parent. It should come as no surprise, then, that post-divorce parental abduction is considered a serious form of child abuse. Psychological maltreatment may predominate or be accompanied by physical abuse and neglect. Abducting parents take the idea that the child would be better off without the other parent to an extreme. Clawar and Rivlin found that would-be abductors often felt frustrated in their efforts to gain access to their child through the legal system and felt "forced" to abduct the child (7). Sometimes, they became so convinced of the terrible scenario they were broadcasting about the target parent that they felt no "choice" but to flee with the child and go into hiding. In order to win the child's cooperation in maintaining concealment, the abductor must continue to brainwash the child with fear of the target parent and what would happen if the target parent should find the abducting parent and child.

CONCLUSION TO PART I

Review of this first portion of relevant literature and research indicates that Gardner's concept of PAS has been increasingly discussed and referred to since he introduced the term in 1985. Research on divorce since the early 1980s has been progressively converging with Gardner's work. Johnston's studies of high conflict divorce in particular suggest that it is not sufficient to lump PAS with high conflict divorce in general. In its more severe forms, PAS is clearly distinctive. It is also more destructive for children and families and can be irreversible in its effects. As the section on alienating parents indicates, the divorce population includes a significant proportion of parents who have psychological problems and disorders. The degree to which such problems are expressed in efforts to alienate the child from the other parent has to be evaluated in the total divorce context, including psychological factors of the child and character and conduct of the target parent. Severe PAS is destructive irrespective of the gender of the alienating parent.

Part II attempts to integrate Gardner's work on PAS with the relevant literature and research under the following topic headings: The Child in PAS; The Target / Alienated Parent in PAS; PAS and its Third Party Participants; Attorneys on PAS; Forensic Evaluation and PAS; and Interventions for PAS, including strategic combinations of court orders and therapeutic interventions, appointment of a Special Master, appointment of a Guardian ad Litem, changing custody, use of hospitalization and other transitional sites to facilitate custody changes, and the appropriate application of sanctions to help certain programming parents to better act in their children's best interests.

Whether or not one chooses to use Gardner's terminology, the problems posed by these cases to families, professionals and the courts are very real. Reluctance to consider Parental Alienation Syndrome by name, along with the diagnostic and interventions it entails, tends to contribute to the perpetuation of the problem in a variety of ways. Like any other label, that of PAS has the potential to be misapplied and misused. Whether or not it is the appropriate diagnosis in a given instance must be determined based on facts of the case, corroborated historical evidence and data from multiple sources. An appropriate diagnosis of PAS, including level of severity as Gardner recommends, can make the difference between allowing a case to go beyond the point of no return or intervening effectively before it is too late.

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THE SPECTRUM OF PARENTAL ALIENATION SYNDROME (PART II)

Deirdre Conway Rand, Ph.D.

This three-part article reviews the literature on the Parental Alienation Syndrome (PAS) as formulated by Dr. Richard Gardner and seeks to integrate his work with research on high conflict divorce and the work of other professionals in this arena. Parental Alienation Syndrome (PAS) is a distinctive form of high conflict divorce in which the child becomes aligned with one parent and preoccupied with unjustified and / or exaggerated denigration of the other, target parent. In severe cases, the child's once love-bonded relationship with the target / rejected parent is destroyed. Part I begins with sections on the child in PAS, the target / alienated parent and the third parties who become involved, including family, friends, lawyers, mental health professionals, and sometimes cults. The material presented on PAS in the legal arena is devoted to what attorneys and judges have to say about PAS, which can be a key issue in certain dependency and criminal proceedings, as well as in family law court. The discussion of forensic evaluations and PAS includes contributions by custody evaluators and others who recommend considering PAS as a possible explanation when child sex abuse is alleged in certain contexts. Case vignettes in Part II illustrate psychological maltreatment of the child in severe PAS, a case in which Child Protective Services was mobilized to bring pressure on the alienating parent to reverse the PAS, and the use of PAS testimony in criminal proceedings against a falsely accused parent. Part III will be devoted to interventions in PAS, including some difficult but effective interventions implemented by the author, her husband, Randy Rand, Ed.D., and a team of interveners, including the judge and guardian ad litem.

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The Parental Alienation Syndrome (**PAS**) as formulated by Gardner involves a cluster of child symptoms in divorce. Gardner views these as a syndrome because of the number of cases in which these symptoms share a common underlying etiology. This is a combination of the alienating parent's influence and the child's active contributions to the campaign of denigration against the alienated / target parent. The term **PAS** does not apply when children of divorce become alienated from a parent for reasons such as a parent's lack of interest in or rejection of the child; significant deficits in a rejected parent's functioning which may not rise to the level of abuse; or the child being subjected to bona fide parental abuse or neglect. These situations should be given the generic label of parent-child alienation. The Parental Alienation Syndrome as conceived of by Gardner is a type of parent-child alienation but warrants a special descriptive term. The benefit of using Gardner's terminology is that, where the facts of a given case support a diagnosis of **PAS**, there is a body of knowledge regarding which legal and therapeutic interventions are likely to be effective.

Part I of this article, published in a previous issue of the *American Journal of Forensic Psychology* (Volume 15, issue 3, 1997), outlined Gardner's formulation of **PAS**, discussed the contemporary social context in which his ideas arose, and described the features of **PAS** which, especially in more serious cases, make it a distinctive form of high conflict divorce. The studies reviewed in Part I included a large scale research project by Clawar and Rivlin, which was commissioned by the American Bar Association Section on Family Law (1). Clinical studies of **PAS** by Dunne and Hedrick (2), Lund (3) and Cartwright (4) were also discussed. Two case vignettes were presented, one in which the mother was the alienating parent and the other with the father in that role. Part I concluded with a section on parents who induce alienation, utilizing divorce research and the work of mental health professionals who deal with divorce families in the forensic arena. Part II begins with the child.

THE CHILD IN PAS

Children of Divorce

Most children and adolescents of divorce are eager to have an ongoing relationship with both parents. In a nonclinical sample of 131 children from 60 divorce families, the majority of children were eager to visit their noncustodial fathers and often wanted more time than the usual every other-weekend allowed (5). This finding held at follow-ups 18 months and 5 years later. For children whose fathers did not take much of an interest in them, their longing for both parents was very painful. Where the father did take an interest, 20 percent of children were in considerable conflict about visiting and 11 percent were genuinely reluctant to visit, most notably those who were between 9 and 12 years of age. Nineteen percent of the children who were reluctant or refusing to visit were aligned with one parent in actively doing battle against the other parent. Children in these alignments came to share the views and outrage of the parent with whom the child identified, often the parent who felt abandoned and rejected in the divorce. These children rejected the parent who was perceived as deserting the family, despite a previously close, loving relationship with that parent. Children in alignments were found to be less psychologically healthy than those whose divorce adjustment allowed them to maintain their affection for both parents.

Children's Alignments in High Conflict Families

Johnston and Campbell's research on divorce families in high conflict for three years or more found a measurable degree of alignment between children and one parent in 35 percent to 40 percent of children from 7 to 14 years of age (6). Similar ratios were obtained by Lampel, who studied latency-age children participating in custody evaluations (7). Comparing aligned children with non-aligned children, Lampel found that the aligned children tested as angrier, less well adjusted, and less able to conceptualize complex situations. They expressed greater self confidence, however, possibly reflecting the relief obtained by opting for a simplified, relatively black-and-white solution, as opposed to feeling "caught in the middle" of parental conflicts. Published in 1996, this article of Lampel refers to Gardner's work on PAS.

Children Who Reject One Parent

Ten years earlier, Lampel reported on 18 consecutively referred high conflict divorce families, including a group of children who actively rejected one parent (8). In these seven cases, the rejected parent was the father. Lampel found the child's lack of normal ambivalence noteworthy in these seven cases and further observed intense collusion between mother and child. Lampel implemented a family intervention strategy which treated these children's reactions as a phobia with hysterical features. One child who was placed with the rejected parent for six to eight weeks while Lampel worked intensively with all family members reported a marked reduction in symptomatology. Of the remaining cases treated with phobia reduction techniques, results ranged from minor improvement to deterioration. In the three cases where intervention clearly failed, Lampel concluded it was because the mother's collusive involvement with the child was too strong.

Children Who Refuse Visitation

According to Johnston in 1993, "It is surprising that such a perplexing and serious problem as children's refusal to visit has received so little systematic attention by researchers" (9. p. 110). In a study focused specifically on this problem, Johnston recognized Gardner's work on PAS. Results of research by Johnston and her colleagues led to the conclusion that children's resistance or refusal to visit a nonresidential parent after separation and divorce is an overt behavioral symptom that can have

its roots in multiple and often interlocking psychological, developmental and family systemic processes. Clawar and Rivlin articulated similar findings in their study published two years earlier (1).

Developmental Issues of Children Who Refuse Visitation

Analysis of data from 70 high conflict divorce families enabled Johnston and her colleagues to identify specific developmental issues for each age group which can impact children's reluctance and refusal to visit. Emotional disturbance of the primary parent, usually the mother, was found to exacerbate developmental effects. For 2- to 3-year-olds, age appropriate separation anxiety from the mother was found to be a factor in resistance to visitation. In normal development, children this age have not yet developed an internalized image of the primary parent figure.

Their sense of time is not yet sufficiently developed for them to understand that they will be getting back to the primary parent within a comfortable time frame. Parents may blame each other when children this age display resistance to visitation, even though such problems may be due in part to developmental factors.

Johnston found that 3 to 6 year-old children in high conflict divorce tended to shift their allegiances depending on which parent they were with. This may contribute to children's difficulty in transitioning from one home to another. Normally, children in this age group have not yet learned to entertain two conflicting points of view. As a result, when the child is told in mother's home that father does not provide enough money, the child will temporarily align with mother. The child will shift allegiance to father when told in his home that mother just wastes the money. Children from 3-6 years of age become easily confused and can readily excite concern and chaos by telling different stories to each parent. In addition, the normal course of development is for children's preferences to shift back and forth from one parent to the other as they grow older and sort out their gender identity. Children in the 3-6 age range experience a strong drive to align with the opposite sex parent and to compete with and to exclude the same sex parent. In divorce, the young child's developmentally normal fantasies about eliminating the same sex parent may be fulfilled. This creates intense guilt and anxiety for the child, which can contribute to resistance to visitation.

Children of divorce in the 6- to 7-year age range are more likely to suffer from loyalty conflicts, and to be concerned about hurting their parents. Such conflicts reflect the normal child's growing sense of morality and capacity to see things from the viewpoint of another. Children 7 to 9 years of age have begun to develop the capacity to imagine how their parents view them and to experience the cognitive dissonance of their parents' conflicting views. There may be a growing need to resolve such conflicts because children in this age range experience the loyalty conflicts of divorce more acutely.

High conflict divorce children in the 9- to 12-year-old group are particularly vulnerable to forming strong, PAS type alignments with one parent, as they try to "resolve" their earlier loyalty conflicts. Johnston noted that adults also tended to expect more of children this age, viewing them as "old enough to take a stand" in parental disputes. Forty-three percent of these children were in strong alignments and 29 percent in mild alignments. According to Johnston, these figures approach Gardner's estimate that 90 percent of the children he has assessed in custody evaluations exhibit varying degrees of PAS. Johnston found that in some cases, parent / child alignments often continue for several years into mid-adolescence. As teenagers, some aligned youngsters develop the capacity to take a more objective, independent stance. However, a significant proportion of high conflict divorce children are unable to withdraw from the parental fights and maintain their stance of rejection and denigration toward the target parent throughout adolescence.

Strong Alignments

Johnston found that 28 to 43 percent of the 9- to 12-year-olds were in what she termed "strong alignments," characterized by consistent rejection and denigration of the other parent (9). Children tended to make stronger alliances with the more emotionally dysfunctional parent, who was more likely to be the mother. In *Impasses of Divorce*, Johnston described children in strong alignments as forfeiting their childhood by merging psychologically with a parent who was raging, paranoid, or sullenly depressed (6). Factors within the child which contributed to the formation of strong alignments were found to be: 1) need to protect a parent who was decompensating, depressed, panicky or needy; 2) need to avoid the wrath or rejection of a powerful, dominant parent (often the custodial parent on whom the child was dependent; and 3) need to hold onto the parent the child was most afraid of losing, for example, a parent who was too self-absorbed or who was only casually involved with the child.

Extreme Alignments

Among children who were refusing visitation, Johnston identified a particularly troubled group of children whom she described as being in "extreme alignments" (9). In her most recent book, she and Roseby reserved Gardner's label "parent alienation syndrome" for these cases (10). Children in extreme alignments were more likely to be viewed as disturbed by parents, teachers and clinicians (9). These children exhibited bizarre and sometimes destructive behavior. They were more likely to display unintegrated, chaotic attitudes with few workable defenses. Often the child's negative interpretation and distortions of the target parent's character and behavior were found to have a bizarre quality (6, 9). The case vignette of Mr. and Mrs. C in Part (I) I described how the behavior of their daughter, V, became increasingly bizarre and self-destructive especially after her father gained sole custody in dependency court based on false allegations of sexual abuse against Mrs. C's new husband.

Pseudologia Fantastica

Once separated from her mother, V's stories of abuse by her stepfather became more numerous and improbable, including charges of repeated rape although the gynecological exam was normal. Bernet suggested that the century-old concept of *pseudologia fantastica* is one explanation for elaborate, implausible, untruthful reports of abuse (11). Children who exhibit *pseudologia fantastica*, represent certain fantasies as if they were actual occurrences, although there is little or no reality basis for these stories. Ditrich posited that children who engage in *pseudologia fantastica* do so in order to defend against the pain of an unbearable, present reality (12). V engaged in *pseudologia fantastica* in part to cope with the unbearable loss of her mother, who had been the primary parent. Her father, Mr. C was so driven by his need for revenge against V's mother that he encouraged and reinforced V's use of *pseudologia fantastica* instead of providing reality testing.

Failed Separation-Individuation

In a recent book chapter entitled "Parental Alignments and Alienation Among Children of High Conflict Divorce," Johnston and Roseby opined, "Rather than seeing this syndrome as being induced in the child by an alienating parent, as Gardner does, we propose that these 'unholy alliances' are a later manifestation of the failed separation-individuation process in especially vulnerable children who have been exposed to disturbed family relationships during their early years" (10; p. 202). These disturbed family relationships are viewed as the byproduct of interparental conflict and narcissistic disturbance of one or both parents. These authors hypothesize that the more extreme forms of parent alienation in early adolescence have their roots in failed separation-individuation from the alienating parent during the earliest years of the child's life. This developmental failure adversely affects the young person's life and developing sense of self. The most important ingredient in certain severe

parental alienation cases, according to Johnson and Roseby, is the child's vulnerability and receptivity to the alienating parent, rather than "conscious, pernicious brainwashing" by an embittered parent.

In contrast to this view, mental health professionals practicing in the forensic arena often find evidence of substantial volitional activity on the part of the alienating parent in severe PAS. For example, in the case of Mr. and Mrs. L in Part I, the custody evaluator and others observed that the mother timed her suspected abuse report to authorities in such a way as to prevent father's visitation from going forward. Mrs. L was also observed to make denigrating remarks about Mr. L in front of the child. Whether or not these behaviors were "conscious" or "unconscious," Mrs. L was the person responsible for them and they did impact the child's relationship with the father.

Important Deviations From Usual Developmental Trends

When children who are resistant to visitation deviate from usual developmental trends, it is important to evaluate and understand the reason. Children who form consistent alignments with an alienating parent may never have separated psychologically from that parent (9, 10). Examples of this are described by Dunne and Hedrick in their study of 16 severe PAS families (2), which was reviewed in Part I. There are a variety of contributing factors to children forming strong parent-child alignments before the highest risk period of 9 to 12 years of age. These factors include: 1) a failed separation-individuation process between parent and child; 2) intense parental pressure; 3) a child with precocious cognitive development who is more sensitive and vulnerable to parental conflict. Children can become aligned with one parent even though there is relatively little overt conflict and estrangement between the parents (9). Seemingly mild and subtle forms of parental influence can have significant effects, according to Clawar and Rivlin (1).

Child's Active Contributions in PAS

The fact that Gardner identifies the child as an active participant in the PAS is sometimes overlooked. Active contributions by the child can be part of an effort to take care of an angry, disturbed, or otherwise troubled parent with whom the child is aligned.

Some PAS children manipulate conflicts between the parents for the feeling of power it gives them in the divorce family situation which is otherwise beyond their control. Young adolescents in search of greater freedom may amplify their complaints about a stricter parent to the more permissive one, capitalizing on the permissive parent's eagerness for validation of his or her fixed negative view of the other parent. This reinforces the permissive parent's inability to contain the child and exacerbates acting out behavior. Regardless of the relative contributions to the PAS by the alienating parent or the aligned child, a mutually reinforcing feedback loop may develop which is resistant to outside influence and to reality testing. A self-generating "brainwashing" process results.

In Munchausen syndrome by proxy (MSP) involving older children, it is the parent who originally initiated the child's factitious illness or victimization. In the context of a continued symbiotic parent / child relationship, older children may then learn to set up this situation themselves, producing factitious symptoms which induce a complicitous response from the MSP parent (13). Similarly, in moderate to severe PAS, children may learn to get their needs met by fabrication and manipulation. Where there is a particularly enmeshed relationship between the aligned parent and child, the child's legitimate strivings for autonomy are continually undermined.

The Overburdened Child

Divorce almost inevitably burdens children with greater responsibilities and makes them feel less cared for. Children of chronically troubled parents bear a greater burden. They are more likely to find

themselves alone and isolated in caring for a disorganized, alcoholic, intensely dependent, physically ill, or chronically enraged parent. The needs of the troubled parent override the developmental needs of the child, with the result that the child becomes psychologically depleted and their own emotional and social progress is crippled. Wallerstein and Blakeslee used the term "overburdened child" to describe this problem (14). Wallerstein has encountered PAS [personal communication to the author, 1991], but she prefers to conceptualize it from the "overburdened child" framework.

The Psychologically Battered Child

According to Garbarino, et al., psychological maltreatment of children is more likely to occur in families where the atmosphere is one of stress, tension and aggression (15), an apt description of high conflict divorce. *The Psychologically Battered Child*, published in 1988, does not mention divorce directly but uses such terms as "marital discord" and "family breakdown." The special problems of children of divorce are more fully recognized in a subsequent book by Garbarino and Stott, in which Gardner's work is cited numerous times, including his work on PAS (16).

According to Garbarino et al., psychological maltreatment can be viewed as a pattern of adult behavior which is psychologically destructive to the child, sabotaging the child's normal development of self and social competence (15). Five types of psychological maltreatment identified by Garbarino et al. are adapted for PAS and described below:

- 1) Rejecting-The child's legitimate need for a relationship with both parents is rejected. The child has reason to fear rejection and abandonment by the alienating parent if positive feelings are expressed about the other parent and the people and activities associated with that parent.
- 2) Terrorizing-The child is bullied or verbally assaulted into being terrified of the target parent. The child is psychologically brutalized into fearing contact with the target parent and retribution by the alienating parent for any positive feelings the child might have for the other parent. Psychological abuse of this type may be accompanied by physical abuse.
- 3) Ignoring-The parent is emotionally unavailable to the child, leading to feelings of neglect and abandonment. Divorced parents may selectively withhold love and attention from the child, a subtler form of rejecting which shapes the child's behavior.
- 4) Isolating- The parent isolates the child from normal opportunities for social relations. In PAS, the child is prevented from participating in normal social interactions with the target parent and relatives and friends on that side of the family. In severe PAS, social isolation of the child sometimes extends beyond the target parent to any social contacts which might foster autonomy and independence.
- 5) Corrupting-The child is missocialized and reinforced by the alienating parent for lying, manipulation, aggression toward others or behavior which is self destructive. In PAS with false allegations of abuse, the child is also corrupted by repeated involvement in discussions of deviant sexuality regarding the target parent or other family and friends associated with that parent. In some cases of severe PAS, the alienating parent trains the child to be an agent of aggression against the target parent, with the child actively participating in deceptions and manipulations for the purpose of harassing and persecuting the target parent. This is particularly likely to occur in what Turkat called Divorce Related Malicious Parent Syndrome (17, 18).

Psychological maltreatment can be mild, moderate or severe. Effects on the child may vary according to the child's age, temperament and ability to access social support.

Children who have been psychologically maltreated by the primary caretaker on whom they depend are more likely to exhibit a variety of psychological and social handicaps. These make them

vulnerable to detrimental outside influences. A case of psychological mal treatment by the alienating parent is illustrated below.

Case Vignette of Psychological Maltreatment in Severe PAS

At 13, S was a socially isolated girl who believed she was stupid. She spent recesses alone because the other kids did not accept her. She got “D” grades in school. For as long as she could remember, her mother told S she was incompetent and unlivable. S's mother would tell her, “Even your baby half sister is smarter than you are”. S hadn't seen her father in 10 years. Her parents separated when she was only a few months old. Her father quickly found a new partner and remarried. Although S's mother tried to stop father's contact with the girl, father and his new wife visited with S regularly until she was three. At that time, mother was successful in persuading child protective services to stop the visitation based on allegations of sexual abuse.

Father turned to the family court for help. A custody evaluation was conducted which exonerated the father of abuse charges and indicated that the mother was using the abuse allegations to prevent the child from having a relationship with her father. After several years of family law litigation, the judge ordered reunification and appointed a reunification therapist. For the next three years, the efforts of the reunification therapist and family court mediator were thwarted by the mother. Father became depressed and entered individual therapy.

A break in the case came when S's father was referred to a **PAS** expert for consultation. The family mediator, reunification therapist and the court were interested in the expert's input. The judge ordered mother and daughter to meet with father's **PAS** expert to facilitate the father / daughter reunification. The court also threatened mother with sanctions when she refused to cooperate with the reunification plan. The reunification team, which now included a guardian ad litem for the child, planned to gradually reacquaint S with her father. The more gradual approach proved un successful. The child remained hostile and staunchly aligned with her mother.

The team agreed that a different approach was needed. The **PAS** expert held a meeting with S and the reunification therapist. The expert established rapport with S, who was guarded but responsive. He asked S questions and gave her information which made her curious about her father. S indicated that she was interested in exploring the contradiction between her belief that father molested her and her lack of any actual memories of molestation. This opened the door for the expert to provide age appropriate education about the concepts of thought reform and “brainwashing”, as well as the problem of “false positives” when abuse is alleged. S was surprised and pleased that the expert thought her smart enough to learn about these adult concepts. For the first time, she indicated she was willing to participate in a meeting with her father.

Despite mother's continued efforts to interfere, a one day visit between S and her father went forward when S was 13. The team agreed that the **PAS** expert should be present at father's house. The girl was thrilled by the interest shown in her by her father and step mother, whose desire to please her contrasted sharply with how her mother treated her. The expert had to intervene once when father and stepmother set reasonable limits and S exploded. When the reunification plan called for overnight visits to begin, S's court ordered individual therapist gave the girl her pager number, with instructions to call day or night if problems arose. S called to say that she didn't want to go back to her mother's. The therapist then had to set limits with S, reminding her that everyone, including S, had to adhere to the parameters of the reunification plan.

S encountered intense anger from her mother each time she returned home. One day, S took the risk of telling her mother that she wanted a relationship with her father. Mother slapped S and told the girl

that she hated her and that the rest of mother's family hated S, too. In spite of mother's efforts to punish and intimidate S, the girl's relationship with her father and stepmother grew and the girl began to blossom. For the first time, S began receiving above average marks in school. She made friends and became involved with a boyfriend. Mother tried to persuade S to get pregnant so that mother could have the baby. When S was at her father's, mother maintained secret contact with her, encouraging S's impulsive, angry outbursts and telling her daughter to run away, which S did several times. As time went by, the reunification team and the court recognized that mother's treatment of S amounted to serious psychological abuse, interspersed with episodes of physical abuse.

Mother refused to participate in treatment or otherwise modify her behavior and the court eventually gave custody to the father. In defiance of court orders, mother continued her secret undermining of S's placement with the father until S had a mental breakdown and had to be hospitalized. Father and stepmother became so discouraged that they considered allowing S to resume living with her mother. The reunification team, backed by the judge, took the position that this was not an option. The team continued to provide coordinated services in support of S's placement with the father, and to offer outreach to the mother. By age 16, S was doing well on a consistent basis. S remained troubled by her mother's rejection and unwillingness to change but continued to hope that someday her mother would get help.

THE TARGET / ALIENATED PARENT IN PAS

Gender

Children are about twice as likely to form PAS type alignments with their mothers as they are with their fathers (3, 5, 6, 9). Similarly, fathers are more likely than mothers to become target parents, especially when

Similarly, fathers are more likely than mothers to become target parents, especially when abuse is falsely alleged (19-23). These and other gender differences were also discussed in Part I. Some fathers who become target or rejected parents in PAS give up and withdraw, contributing to the significant dropout rate of fathers after divorce. Others persist in their efforts to establish and maintain a meaningful post-divorce relationship with their children despite daunting obstacles. What motivates these men to persist in their efforts to father, despite rejection, calumny and protracted litigation?

Struggle for Paternal Identity

Huntington studied fathers in a nonclinical sample of 184 couples who were cooperatively involved in divorce-specific activities at the California-based Center for Families in Transition (24). As fathers struggled with the issue of paternal identity after divorce, many found themselves closer to their children as part-time fathers than they were during the marriage when they were living with their children full-time. The emotional rewards of fathering gave some men new meaning to their lives after the loss, loneliness and feelings of failure engendered by the divorce. When fathers experienced a positive response from their children, they were more likely to pursue the relationship. Huntington also observed that fathers could be driven off by the child's rejection and refusal to visit. She referenced Gardner's 1985 article in which he introduced the term PAS.

Involuntary Child Absence Syndrome

According to Jacobs, a psychiatrist who edited a book on divorce and fatherhood, the stress reaction of some fathers to divorce is due to involuntary separation from their children (25). Such stress reactions in mothers are often given a positive connotation and attributed to "maternal instincts". Jacobs contends there is not nearly as much social support for fathers in a similar situation. He

brought attention to the fact that fathers may have an equally strong need to nurture and parent, experiencing profound feelings of loss and frustration when reduced to a post-divorce relationship with their children which is minimal, diminished, or nonexistent. Working with fathers in a clinical setting, Jacobs found that the ability of these men to adjust to divorce was deeply impacted by their relationship with their children. Some fathers reported that they had been the primary parent during the marriage and that their children needed them in order to cope with a mother who was chaotic and disturbed.

The fathers Jacobs saw were convinced their children would suffer if the father-child bond was ruptured. They felt frustrated and sabotaged in their efforts to maintain the bond but refused to accept the idea that their children could develop well if the father-child relationship was severed. This was true for S's father in the case vignette above. Jacobs reported that the idea of being a "visitor" in their children's lives seemed second-rate and unacceptable to the fathers with whom he worked. Common adjustment reactions included anxiety, depression, hypervigilance and outrage, especially in response to denigration and expressions of hatred by their ex-wives.

Even if it was the father's decision to leave, he was often unprepared for the emotional and practical consequences where his children were concerned. Fathers of young children who were not guaranteed continued close contact felt particularly outraged and betrayed by the system, which was seen as unfair and biased toward mothers. Fantasies of self destruction, murder, and / or kidnapping were common, although usually not acted upon.

Circumstances of the Separation Which Increase Risk of Becoming a Target Parent

The likelihood that a mother or a father will become the target parent in an alienation scenario increases according to who is seen as responsible for the marital break-up (1, 5, 6, 9, 14). The risk increases when the parent seen as responsible for the break-up is discovered to have actually been unfaithful or becomes involved with a new partner immediately after the separation (1). Leaving the marriage precipitously may also incur increased risk of becoming a target parent. The mother became the target parent in this example:

Mrs. E was a good mother but she was also guilt ridden and conflict avoidant. She tried to leave her husband several times but each time he persuaded her to return. When she left for the last time, she allowed the children, who were 3 and 5 years of age, to stay with their father on what mother believed to be a temporary basis. She was shocked at how the children treated her when she came to get them. They rejected her using profanity. Father filed for custody, accusing his wife of drug abuse, neglect and abandoning the children. He tricked Mrs. E. into not attending the custody hearing, telling her it had been put off. When mother failed to appear, the court granted father's motion for custody. It took several months for Mrs. E. to get the court to order a custody evaluation. By the time an evaluator was selected and the evaluation got underway, the children had been living with their father for a year. The evaluator observed that they were distant and somewhat fearful of their mother and recommended that the children remain with the father.

Contributions by the Target Parent to PAS

The relative contribution of the target parent to the PAS scenario varies widely, depending on the severity of the PAS, psychological issues of one or both parents, the target parent's capacity to parent, and other factors.

For intervention to be effective in PAS, it is important to carefully assess the relative contributions of each parent and to consider their relative capacities for a healthy parent / child relationship. Where

the target / rejected parent is seriously disturbed, has abused the child or is seriously inadequate as a parent, the problem may be one of generic parent alienation and is not properly called Parental Alienation Syndrome.

In mild to moderate **PAS**, behavior of the target parent may contribute significantly, as in the case heard by Judge Tolbert which is further described below (26). The nine-year-old girl was refusing to visit her father and he claimed **PAS** by the mother. Based on the totality of the evidence, however, the court concluded that father's behavior contributed significantly to the child's refusal to visit. In particular, father was found to be excessively rigid and insensitive to his daughter's needs, seemingly an example of **Johnston's observation that rejected parents are often inept and unempathic with their children** (6, 10).

In severe PAS, the target parent may be relatively healthy and contribute minimally to the PAS, compared to the alienating parent. This is particularly likely to be the case with Divorce Related Malicious Parent Syndrome, where the alienating parent's anger, aggression, manipulation and deception tend to be driven by internal forces which far exceed external realities and contributions of the target parent (17, 18). The case vignette of Mr. and Mrs. C. in Part (I) demonstrated how a determined, unscrupulous father succeeded in wresting custody from a fit, custodial mother, who was the target parent.

According to Johnston's work with high conflict families, unresolved anger and continued narcissistic injury of either parent may contribute significantly to the child's rejection of one parent (6).

Huntington found that in a nonclinical divorce sample, fathers sometimes engaged in controlling, provocative behavior in their efforts to reestablish a lost sense of control, especially if the divorce was not of their own choosing (24). Nicholas suggested that target parents may reinforce the **PAS** by assuming an ambivalent or inconsistent stance toward custody after years of litigation (27). Lund cited her experience with moderate PAS families in which the hated parent, usually the father, often exhibited a distant, rigid style which was seen by the child as authoritarian, especially in comparison to the preferred parent, who was overly indulgent and permissive (3). It is important not to overgeneralize, however, and to keep in mind that behavior of the aligned parent and child may influence and concretize the ambivalence reserve or indignation of the rejected parent.

Target Parents Who Are Falsely Accused

An accusation of child abuse, especially molestation, can quickly cut off an accused parent's access to his child, pending an investigation (28). Because sex abuse is often difficult if not impossible to disprove, the accused parent may spend months and even years trying without success to refute the charge. Clear resolution of such allegations may be impossible as a result of the accusing parent's actions, poor training and technique of the investigators, involvement of multiple agencies and lack of coordination between agencies and different branches of the judicial system (6).

Even if the charge is successfully refuted and the accused parent's rights are reinstated, the parent has lost valuable time with the child, damaging the parent-child relationship.

According to Patterson, additional repercussions for the falsely accused parent include damage to personal dignity, reputation in the community, and depletion of financial and other resources needed to defend the charge and to preempt the possibility of criminal action (29). An unproved accusation alone is sometimes enough to have an accused parent arrested and held in jail until a preliminary hearing and beyond. A parent who is criminally tried runs a significant risk of false conviction in the current legal climate. When sex abuse is alleged today, the presumption of innocence is often set aside with the justification that it is better to convict an innocent person than to allow a real child abuser to go free. Patterson's article references Gardner's book, *The Parental Alienation Syndrome*

and the Differentiation Between Fabricated and Genuine Child Sex Abuse. Patterson concludes, "We can never serve a child's best interest by denying him or her the love and affection of a parent who has himself been victimized by a lie" (29; p. 941). '

Benign and Positive Characteristics of Target Parents

Studies of target parents who are falsely accused of abuse report they tend to be less disturbed than their accusing counterparts (19, 21-23). Blush and Ross observed that falsely accused fathers tended to display passive or dependent features as compared with their more histrionic spouses (19, 21, 22). Sanders, an attorney who represents fathers in **PAS** type cases, indicated that she often found her clients to be emotionally and financially stable individuals who, prior to the separation, functioned as the primary parent for their children (30). When Dunne and Hedrick studied the effectiveness of various interventions in severe **PAS**, they found that better outcomes were achieved when the alienated parent was given custody (2). The alienating parents in the change of custody cases exhibited significant emotional disturbance in contrast to some of the target parents who were deemed fit and capable of establishing and maintaining a healthy parent / child bond.

Rogers reported similar findings in her review of cases in which certain alienating parents who made false allegations of abuse were found to suffer from Delusional Disorder, with the result that the father / target parents were eventually awarded custody in several instances (31). The fact that target parents make good custodial parents in some cases is demonstrated in the vignette of S and her father, reported above. S's father was an unassuming man who worked in a clothing store. He was convinced that his daughter could not grow up well without him and was determined to play a positive role in her life. When he remarried, it was to a kind, capable woman who took a strong interest in S and who provided invaluable support when S was 13 and the father / daughter relationship was reestablished.

THIRD PARTIES WHO BECOME INVOLVED

Unholy Alliances and Tribal Warfare

In high conflict divorce, the social networks of the spouses can be come incorporated into the dispute scenario, helping to maintain, solidify or expand it, leading to "tribal warfare" (6). With the breakdown of the marriage, once private details of the couple's relationship often become the subject of lengthy conversations with sympathetic, potentially supportive others about what went wrong and who is at fault. Hearing primarily one side of the story, family, friends and professionals may lose their objectivity as they try to protect someone they care about or to bolster a parent's self esteem. Such support may be mixed, however, with what is experienced by the distressed parent as criticism, interference, obligations and demands which create stress above and beyond the divorce itself.

Johnston found that women were more likely after separation to depend economically on family members or kin. Women were also more likely to involve these "support people" in the parental disputes (6). Third parties entering the dispute initially were likely to do so on behalf of the mother. According to Johnston, the other side typically responded by assembling a comparable array of allies. A stepwise progression of active and reactive coalition building was then likely to ensue.

New Partners

The advent of a new partner in divorce may escalate parental disputes over the child or precipitate new ones (6). A parent who feels threatened by an ex-spouse's new partner may initiate efforts to gain increased control of custody and visitation. Sometimes, new partners are the instigators and mobilizers of custody disputes, where previously there was little overt conflict between the parents. The new partner may be experiencing difficulties in the new marriage, feel a need to prove

themselves, or be gratifying their own needs for domination and control. Alternatively, the new partner may bring a more objective viewpoint regarding the degree to which the child is being harmed by an emotional disturbance of the parent in the other household and provide a balancing influence.

Role of Mental Health Professionals

Mental health experts can become involved in contested custody / visitation disputes in a variety of roles: as evaluators, therapists, advocates, mediators, case managers, educators and / or consultants to parents or their attorneys. Mental health professionals may assist in identifying the needs of the child, assessing strengths and weaknesses of the parents, modifying the specific dynamics of parental conflict and advising the courts. In many jurisdictions, the courts are increasingly relying on the assistance and input of mental health professionals. This entails rising costs for divorcing parents who must pay for these services. Some argue that mental health services which help to reduce the often escalating cycle of action and reaction between the parents saves them money in the long run by reducing litigation costs. On the other hand, mental health services may be protracted and ineffective in high conflict cases. Sometimes they actually cause damage to the parties and to family relationships.

Potentially Harmful Influence of Mental Health Professionals

Written and verbal statements by custody evaluators can have a negative impact on disputing parents, especially when the situation is explained in terms of what is wrong with the parents (6). Parents are particularly vulnerable during the upheaval of the separation. Comments by mental health professionals in this context, especially when publicized, can escalate parents' needs to vindicate and defend themselves from further exposure and humiliation.

Lund pointed out that therapists, especially individual child therapists, can unwittingly become part of the system maintaining **PAS** (3). This is more likely to occur when the therapist takes statements by the aligned parent and child at face value, lacks knowledge about **PAS** and avoids contact with the target parent.

Campbell (32) discussed the pitfalls of triangulated relationships in doing therapy with children of divorce, citing Gardner's first book on **PAS** (33) in the opening paragraph. One of the problems for therapists seeing children of divorce is that the parent who selects the child's therapist, who brings the child for therapy and who arranges for payment is in a position to influence the therapist regarding the therapist's role, the goals of treatment, and who participates. Therapists who are provided with incomplete, selective data are at risk for reinforcing and endorsing the idea that the child needs to be "saved" from the alienated parent. A variation of the victim-villain-rescuer triangle may then develop. Citing well known family therapist Murray Bowen, Campbell observed, "When clients and therapists organize their relationship around the reciprocity of victim and savior, the identity of each demands that the other persist in their respective role" (34; p. 479). When abuse is alleged, advocate therapists may become so overinvolved as to exhibit what amounts to a shared paranoid disorder with the aligned parent and child (35).

Campbell observed that professionals can become slowly compromised by the "us versus them" mentality in the context of adversarial family relationships and legal proceedings (32). As discussed in the section to follow, an advocate therapist for an aligned parent and child may inappropriately use the therapy sessions to "validate" allegations of abuse against the target parent, rather than helping the child adjust to the divorce and maintain affection for both parents. The individual therapist for an alienating parent may agree to recommend to the court that the client have custody, without meeting

the other parent. Target parents may also recruit advocate therapists to their side, as demonstrated by the father in Judge Tolbert's case (26), which is presented below. Mental health professionals who make custody recommendations without interviewing both parents may be in violation of ethical standards. Where professionals compromise themselves in high conflict cases, valuable information about parental dynamics can often be gleaned from analyzing the process by which this occurred.

Influence of Therapist Attitudes

The fundamental beliefs of many therapists about the etiology of psychological problems and what constitutes appropriate treatment can make the therapist an unwitting reinforcer of alienation. Psychotherapy is a potent form of social influence. Campbell conducted a study which revealed that the majority of therapists make significantly more negative than positive inferences about significant others in their client's lives (34). In addition, therapists frequently assume that the client's psychological distress has its origins in an interpersonal environment which is "disrespectful psychologically avoidant, unempathic and punitive". These assumptions can substantially influence the course of treatment and the client's view of their situation. Children of divorce may feel overwhelmed by the chaos and hostility of their parents' conflicts. They may also feel a sense of betrayal when a parent moves out and the parents are focusing more on their conflicts with each other than on their parental responsibilities (32).

Child therapists who are predisposed to making negative inferences about significant others in the child's life may inadvertently reinforce a child's sense of anger and blame toward a target parent, sometimes in very subtle, pernicious ways. Where the therapist's own view of the target / alienated parent is negative, even if only to mild degree, the therapist's view is likely to adversely influence the child. This provides fertile ground for the development and reinforcement of PAS. A detailed example of such a process is presented in *The Real World of Child Interrogations* which contains an analysis of multiple child therapy sessions in a contested custody case (36). Transcripts of the sessions illustrate the process by which the therapist helped teach the child to make abuse allegations and reinforced the child's expressions of hatred toward the target parent in this case the father.

Validators

When abuse is alleged, anyone in a position of authority can act as a "validator," including therapists, police, child protection workers, and medical personnel (37). Validators are professionals who, when presented with allegations of abuse, assume that abuse occurred. They see their role as validating the alleged abuse rather than conducting an objective investigation. Validators are relatively easy to find, especially when sought out by a parent seeking to strengthen their position in legal proceedings. Validator interviews of the child tend to promote the child's voicing of an abuse scenario, whether or not abuse occurred.

Real World of Child Interrogations

Once the issue of molestation is raised, the child is often subjected to repeated interviews and evaluations, sometimes more than 20, according to a family law judge in California (28). An analysis of 150 tape-recorded abuse interviews with children identified specific adult interviewer behaviors which influence children to alter accounts and to say things that will satisfy or please the interviewer (36). Most adults are unaware of how their ideas and expectations teach children to conform their accounts to the expectations of the adult interviewer. When the child is brought by a parent for an abuse interview, the parent's report of what occurred tends to shape the interviewer's ideas about what occurred and the questions which are asked. These interviewer expectations are communicated to the child through the adult's reactions, leading questions and other suggestive techniques (e.g., drawings

or “anatomical dolls ”). Such effects occur even among professionals trained not to use suggestive methods.

Suggestibility of Children's Recollections

There has been a growing body of research in recent years which shows the potential for interviews to teach children what adults expect to hear. Ceci and Bruck conducted a comprehensive historical review and synthesis of this research in an article on the suggestibility of witnesses (38). These authors cited Gardner as raising important questions about the ability of powerful authority figures to coach children and about children's ability to differentiate fact from fantasy. Ceci and Bruck's review resulted in several important scientific findings:

- 1) There appear to be significant age differences in suggestibility, with preschool children more vulnerable to suggestion than either school-age children or adults.
- 2) Children can be led to make false or inaccurate reports about very crucial, personally experienced, central events.
- 3) Children sometimes lie when the motivational structure is tilted toward lying.
- 4) The previous points notwithstanding, children, including pre-schoolers, are capable of recalling much that is forensically relevant.

Ceci and Bruck concluded that in order to know the reliability of a child's report, the conditions surrounding the report need to be carefully evaluated, including prior access to the child by an adult motivated to distort the child's recollections. Distortions frequently occur as a result of relentless and potent suggestions by adults, sometimes to the point of outright coaching.

Memory Research and its Forensic Implications

Many people subscribe to the incorrect belief that memory is somehow fixed and not malleable. Loftus and her husband surveyed 169 people from a variety of socioeconomic groups (39). The majority of respondents endorsed the belief that everything we learn is permanently stored in the mind and that consciously inaccessible details can be recovered with the use of special techniques such as hypnosis. Psychology graduate students were particularly prone to endorse this view, although it is disproved by three decades of research. It turns out that memory can be altered in a myriad of ways.

The implications for law enforcement and the courts are staggering since eyewitness testimony is heavily relied upon in these settings. The American Psychological Association sought to address these problems where children are concerned, publishing a compilation of articles by psychology's leading authorities on memory entitled *The Suggestibility of Children's Recollections: Implications for Eyewitness Testimony* (40). Ceci and Loftus were among the contributors.

Parents as Interviewers

Parents who are preoccupied with suspicions of abuse by the other parent often question their children repeatedly. Some false allegations of abuse in divorce begin with a parent questioning the child after visitation about a rash, a bruise, or bathing at the other parent's house. Everson described the case of a six-year-old-boy who produced more and more elaborate accounts of abuse in response to the attention and support he received from his mother as they discussed “his memories” of abuse each night at bedtime (41). Initially, the child provided a consistent, plausible account of a teenage baby-sitter fondling his genitals and anus. The baby-sitter confessed to this. Over the course of several months, however, the child's description of what occurred became more elaborate, bizarre, implausible, and finally impossible. According to Everson, the child may have become confused about the

source of his more fantastic “memories” which probably grew out of the conversations with his mother. This is sometimes referred to as “source amnesia”. Everson referenced Gardner's work relating to the assessment of child sexual abuse.

When Cults Have a Role in Parental Alienation

In extreme cases, a divorced parent determined to deprive the other parent of a relationship with the child will join a cult for the powerful help the group can provide in alienating the child from the other parent. In an effort to recruit and control members, cults have perfected the art of parental alienation. Cults are sometimes involved in parental child abductions. Attorney Ford Greene, who specializes in litigation against cults, contributed the following family law case (42).

Mr. Y was wounded and angry when the mother of his only son decided to end their common law marriage. Mrs. Y was eager to mediate the dissolution and offered to stipulate to joint legal custody with reasonable visitation to the father. Mr. Y refused and took Mrs. Y to court, where the judge ordered the custody / visitation plan first suggested by the mother. Mr. Y became involved with a quasi-religious cult. He used his visitation time to involve his 10-year-old son in the group's activities. Under the auspices of the group, the boy was regularly hooked up to a bio feedback device for the purpose of training him to become “emotionally disconnected” when thinking about or interacting with his mother. The child's mental state and behavior gradually deteriorated. One day, the boy did not return to his mother's home after school. Instead, he rode his bike ten miles from school to the ferry, crossing the bay and riding through a bad part of town to reach the group's headquarters where his father was waiting for him. Mother turned to the court for assistance in getting her son back and protecting him from the father and the group. The group tried strenuously to prevent the court from intervening, invoking the special protections the law provides for religious beliefs. Greene, who was representing the mother, focused on specific group practices which were physically or psychologically detrimental to the child's best interests. He stayed away from the legitimacy of the group's religious doctrines. After hearing the evidence, the court found that the group's influence on the child was mentally and emotionally detrimental. Mother was awarded sole legal and physical custody.

People tend to think of cults as large, well organized groups. According to Singer and Lalich, however, cultic social organization can also be found in very small groups, such as the Symbionese Liberation Army (SLA) which abducted Patricia Hearst (43). Cults can be organized around different ideological themes such as prosperity, health, psychotherapy, UFOs, or religion.

Regardless of size or thematic focus, cults share certain social structures in common. The group is built around a charismatic leader who controls the members directly, or indirectly with the help of loyal followers. Cults routinely employ deception in recruiting, often using elaborate, cleverly conceived fronts to conceal the true nature of their activities. New members are taken through a progressive process of thought reform, sometimes referred to as “brainwashing”. Compliance is obtained in small steps which isolate inductees from the influence of non members and which foster dependence on the group. The process discourages criticism of the group's ideas and encourages inductees to replace “old” ideas and relationships with the group's ideology, which is portrayed as “new” and more advanced. Recruits are encouraged to reject the past and to drastically reinterpret their life history. These tactics destabilize the inductee's sense of self and increase motivation to serve the group and its leader. When the recruit's indoctrination is complete, he or she can then be deployed as an agent of the organization, to help expand the group's financial resources, power, and influence.

Almost anyone can be drawn into a cult under the right set of circumstances (43). People are most vulnerable to recruitment when they are depressed and between affiliations. Almost by definition, parents of divorce are “between affiliations”. To varying degrees, they are also likely to experience

depression at some point in the divorce process. Religious cults may appeal to divorce parents who are seeking validation of their blamelessness and moral superiority in the proceedings. Pastors and other church members in fundamentalist religious cults may openly denigrate the target / alienated parent to the children, claiming the authority of their holy book in referring to the target parent as an “adulterer”, “harlot” or “whore”.

In a presentation at a recent forensic conference, Bower (44) pointed out similarities between the mechanisms by which cult leaders control their followers and the tactics of alienating parents who form “unholy alliances” with their children. Similar comparisons appear in *Children Held Hostage* (1). This study of 700 divorce families, was reviewed in Part I. Clawar and Rivlin anchored their research in 30 years of literature on the psychology of social influence, including indoctrination techniques variously referred to as brainwashing, mind control, thought reform, modeling, reeducation and coercive persuasion. Bower likened the alienating parent to the leader of a one-on-one or small group cult, pointing out that children's dependence on parents makes them vulnerable to this source of influence. The aligned parent and child, along with other supporters of the alienating parent's views, come to share, a closed, impermeable belief system, similar to the fixed ideology of an organized cult.

In normal circumstances, the power differential in parent / child relationships helps parents to instill a sense of conscience and moral values in their children. As children grow, the love they experienced from their parents in early years becomes a model for treating others with courtesy and considering other people's feelings. In more severe **PAS** however, the child's social and moral development are to-opted to varying degrees by the alienating parent's agenda. In extreme cases, children growing up in the custody of an alienating parent become “corrupted,” in the sense defined by Garbarino et al. They are encouraged to use deceit, manipulation and aggression in the service of the **PAS** agenda. The SLA succeeded in “corrupting” Patricia Hearst for a time: After she was subjected to isolation, indoctrination, terror and intimidation, she was induced to participate in a bank robbery, a violation not only of the law itself, but of her previous moral values. Once separated from the SLA, she was able to resume prosocial values.

In extreme cases of cult indoctrination, members are trained to commit suicide rather than have contact with “evil”, “dangerous” outsiders. In a parallel situation, severe **PAS** sometimes involves direct or indirect encouragement by the alienating parent for the child to threaten suicide or homicide if forced to have contact with the alienated parent. Johnston encountered a case in which a 10-year-old boy hung himself when the court ordered that he be placed in the custody of his alienated father (10). Two cases of attempted homicide by the child were reported in Part I (4, 45). Both boys were in *folie a deux* relationships with their disturbed mothers after the parents divorced.

One boy tried to poison his father (4), the other tried to burn his father's house down (45). Careful evaluation and case management are required when there is reason to suspect that the child may be a danger to self or others. Part III, devoted to interventions in **PAS**, will include the case vignette of two sisters who threatened suicide and homicide when told they would be court ordered to see their father. Father had been the custodial parent per order of the family court. Mother succeeded in alienating them and got custody through the dependency court, by involving the children in false allegations of abuse. The girls' threats were taken seriously and the family court ordered hospitalization at a facility willing to deal with the possibility of **PAS**. In the safety of a contained, closely monitored, therapeutic setting, the girls were successfully returned to father's custody.

PAS IN THE LEGAL ARENA

Legal Recognition of PAS

An increasing number of attorneys are publishing articles which recognize and seek to address the problem of parental alienation, variously using the term Parental Alienation Syndrome in the title, in the text or in the bibliography (30, 46, 47, 49, 50, 54, 55). California attorney Patrick Clancy posts his Points and Authorities for the Admissibility of PAS Testimony on his web site. An article by Wood opposes legal recognition of PAS (56). Family law judges have been producing a growing body of opinions which discuss PAS by name or include findings of parental alienation without giving it a special label (26, 46, 47, 54-57). A 1997 issue of *The Judges' Journal* included an article on managing visitation interference by Turkat (57), who has been referencing Gardner's work on PAS for several years. Judge Vernon Nakahara in Alameda County, California, spoke with author Deirdre Rand about his opinion that judges need to be made aware of Gardner's work on PAS. Judge Nakahara also shared his views on the role of the family law court in dealing with PAS and other high conflict cases.

A Florida attorney was the first to write about PAS after Gardner introduced the term in 1985. Palmer's article, published in 1988, described PAS as a strategy some parents were using to avoid their obligation to share parenting responsibility under Florida law (46). She discussed two legal cases, including *Schutz v. Schutz* in which the judge opined: "The Court has no doubt that the cause of the blind, brainwashed, bigoted, belligerence of the children toward the father grew from the soil nurtured, watered and tilled by the mother. The Court is thoroughly convinced that the mother breached every duty she owed as the custodial parent to the noncustodial parent of instilling love, respect and feeling in the children for their father. Worse, she slowly dripped poison into the minds of these children, maybe even beyond the power of this Court to find the antidote" (46; pp. 361-362). Palmer foresaw the need for early evaluation and intervention in cases of PAS and those with that potential, in order to prevent the development of completed, intractable alienation. She recommended the use of judicial sanctions to hold alienating parents accountable and to provide incentives for changing their behavior.

In 1991, a Canadian law journal published an article by Goldwater which strongly supports legal recognition of PAS (47). According to Goldwater, Gardner's 1989 book on family evaluation in child custody (48) "is certainly required reading for the family practitioner and should be considered the source document on the phenomenon of parental alienation syndrome...Indeed, there is a moral failure in smugly asserting that children have 'rights' without taking into account their evident lack of autonomy and their material and psychological vulnerability to control and manipulation" (47; pp. 121-122). Although the title is in French, most of the text is in English. Canadian law and case citations are discussed.

In 1993, two articles were written by attorneys; one from New Hampshire (49) and one from South Carolina (30). These articles took a practical approach to the special difficulties PAS cases pose to family lawyers, mental health professionals and to the courts. Ward and Harvey are a psychologist and an attorney, respectively (49). Their article distinguishes between "typical" divorce and "alienation". Alienation cases are distinguished by the nature and extent of a parent's willingness to involve the children.

According to Ward and Harvey, alienation family systems require their own specific interventions, a point Gardner continues to emphasize. They build on Gardner's concepts about PAS and synthesize them with Johnston's work on the divorce impasse and high conflict families.

Sanders discussed PAS along with bad-faith relocation and fabricated sex-abuse allegations (30). She referred to Parental Alienation Syndrome as a disorder named by Gardner. She thought that mental health professionals and family law judges were becoming increasingly aware of the harmful process of parental alienation, regardless of the terminology used. Support for this contention can be found by

perusing the programs of family law conferences in recent years. Since at least 1994, conferences of the Association of Family and Conciliation Courts have featured presentations on parental alienation. Gardner's concepts regarding PAS are often referred to and his books on PAS are listed in the bibliographies of hand outs (50-53). Gardner himself presents at major conferences, for example, the Children's Rights Council Conference in Washington, D.C., which is attended by mediators, psychologists, and attorneys, who receive continuing education credits. Continuing education credits were also available to professionals attending the 1997 conference of the American College of Forensic Psychology, which included a presentation on the similarities between PAS and cults, discussed above (44).

Practicing psychology and law in Wisconsin, Waldron and Joanis put forth the view that PAS was readily accepted not because it was a "discovery" but because Gardner succeeded in conceptualizing and describing a familiar, complex, perplexing problem of divorce families which can have tragic consequences and is resistant to change (54). The article contains a number of case citations and a discussion of *Karen "PP" v. Clyde "00."* This case involved a mother who sought to have father's visitation supervised because of alleged sexual abuse. Opinions of the ex-parts involved differed as to whether or not the alleged abuse occurred. According to Waldron and Harvey, this case is often inaccurately depicted as showing the "dangers" of PAS. The court's opinion is often criticized for quoting Gardner's work at length (56), as if this was the sole basis for the court's findings. However, when Waldron and Joanis examined the text of the court's rulings, they found that the court's decisions were based on the evidence presented, not on Gardner's theories. Their article is distinguished for its use of the social influence model outlined by Clawar and Rivlin and its reference to their research.

In Florida, Walsh and Bone practice law and psychotherapy, respectively (55). Their article on PAS, published in June, 1997, appears to be the most recent paper on the subject by attorneys. According to these authors, courts in their state are not at all hesitant about making a decision regarding PAS where the challenging parent can present credible proof and evidence of incidents in which the other parent has been practicing alienation and visitation interference. Four Florida case citations are provided in support of this assertion. These authors highlight the need to assess and understand parental deceit and manipulation, referencing Turkat's work on child visitation interference (57). "Make no mistake about it. Individuals with either PAS or a related malicious syndrome will and do lie! They are convincing witnesses, and their manipulative skills may influence others to follow suit" (55; p. 94).

One of the presentations (50) and three of the articles (49, 54, 55) mentioned above were coauthored by an attorney and a mental health professional. This may represent a trend of increasing collaboration between legal and mental health professionals who provide divorce related services. Recently, psychologist Sharon Montgomery from New Jersey discussed PAS during a panel presentation with two attorneys (58). California psychologist Anita Lampel (7, 8) began editing *The Family LAP* in 1996. The first two issues of this newsletter for attorneys and others interested in family law and psychology contained columns on children of divorce who are alienated or who have rejected one parent (59).

Wood argued against the admission of PAS testimony in the *Loyola of Los Angeles Law Review* (56). She was outraged over the outcome of a divorce / custody dispute in which Dr. Gardner testified. Father was awarded custody after the court found that mother's allegations of abuse against him were without merit. Wood attacked Gardner personally as well as arguing against his ideas. She warned that an erroneous decision based on PAS testimony could result in a child being placed with an abusive parent and leave the child with "no one to tell." Wood failed to point out that allowing a child to remain in the custody of a parent engaged in serious alienating behavior, if such is the case, puts the child at risk for significant psychological maltreatment, as in the case vignette of S, above.

Judge Tolbert on PAS

An extensive opinion by Judge Tolbert, published in the *New York Law-Journal* in 1990, demonstrates the court's ability to match specific evidence with expert testimony on **PAS** (26). Judge Tolbert heard testimony on **PAS** by two experts, including Dr. Gardner who was originally involved as the court-appointed custody evaluator. The child in the dispute was a 9-year-old girl who was refusing visitation with her father. Father retained his own psychological expert who testified that the child's refusal to visit was the result of severe **PAS** on the part of the mother. Father's expert recommended that the father be awarded custody, although he did not interview the mother. Dr. Gardner testified that mother's contribution to the child's refusal to visit constituted **PAS** in the mild to moderate range and that the mother / daughter bond was basically healthy. Based on the evidence presented, including the testimony of other witnesses, Judge Tolbert concluded that the father's own behavior was a significant contributing factor to the child's refusal to visit. Father had been unreasonable and provocative toward the child's mother and his excessive rigidity made him insensitive to his daughter's needs. Judge Tolbert found that the facts of the case supported Dr. Gardner's testimony and that the mother should retain custody. He ordered the parents to participate in family therapy aimed at addressing the problems each of them brought to the situation. Judge Tolbert opined that **PAS** is not so much an emerging area of expertise as a phrase pioneered by Dr. Gardner, similar to the view expressed by Sanders (30) and Waldron and Joanis (54).

Judge Nakahara on PAS and the Role of the Court in Family Law

Judge Vernon Nakahara in Alameda County, California, served on the family law bench for a year after many years as a criminal court judge [Judge Nakahara provided the material in this section by personal communication to author Deirdre Rand in 1997]. When the assignment expired, he elected to continue as the judge for a particularly severe case of **PAS**. It had taken him several months to grasp the complexities of the case and he was concerned that the case would be set back if a new judge had to go through the process all over again.

Judge Nakahara learned about Gardner's concept of **PAS** from the testimony of the court appointed reunification therapist for the child in a severe **PAS** case. The idea made sense to him and helped to explain some of the divorce family problems he was seeing. Upon reading the above quote from the judge in *Shutz v. Shutz*, Judge Nakahara indicated that the description was consistent with his experience. He observed that the alienating parent in more severe **PAS** usually had significant psychological problems. False allegations of abuse were also more likely to be part of the equation. According to Judge Nakahara, varying degrees of **PAS** were evident in most of the family law cases he heard, similar to what Gardner (33) and Johnston (9) report. He cautions family law judges to be aware that in addition to the child, professionals upon whom the court relies may also be "brain-washed" by the alienating parent. This includes attorneys, family court services and private counselors. The opinions of various professionals who become involved should not be accepted as authoritative simply because individuals designated as professionals are making them. The opinions of professionals need to be tested and critically evaluated by the court.

Attorneys and parents also need to be held accountable. During his term on the family law bench, Judge Nakahara did not allow the common family law practice of the court relying on attorneys' representations as to what their client / parents and other witnesses would testify to if called. Similar to criminal cases, he insisted on live testimony so he could test the credibility of witnesses himself. At first, family lawyers in his courtroom were surprised that he expected them to show substantial proof in support of their claims and of the client's position.

They were also surprised by his readiness to impose sanctions. Attorneys quickly learned that they needed to be more careful about their representations in Judge Nakahara's court room and that they would be required to back up their claims.

According to Judge Nakahara, holding parents accountable builds success. Relieving a parent of sanctions builds failure and increases the likelihood that unacceptable behavior will recur. Failure to impose sanctions when sanctions are called for reinforces parents' disregard for court orders and their belief that they can do as they please. When Judge Nakahara threatened parents with sanctions, he gave them choices. One alienating mother failed to take her child to 12 of the 15 court ordered therapy appointments. Judge Nakahara gave her the following choices: 1) take the child for the sessions; 2) spend a day in jail for each session missed; or 3) if mother continued her refusal to cooperate, custody would be switched to the father. At this point the mother decided to start bringing the child for therapy. In another case, a parent with a pattern of visitation interference was frequently tardy for visitation exchanges. Judge Nakahara required the late parent to pay \$ 1 for each minute past the appointed time. He also applied sanctions for such issues as refusal to produce income and expense information, failure to participate in court ordered alcohol treatment and failure to attend the requisite number of anger management classes.

When lesser sanctions failed to produce results, Judge Nakahara did not hesitate to order that a non-compliant parent be taken into custody. The first time he did this on the family law bench, it created a "shock wave" throughout the county legal system-it had been five years since a family law judge in the county had imposed this level of sanction. Experience taught Judge Nakahara that five days in jail is the optimum period of time to make a significant impression on a parent who persists in violating and resisting court orders.

Role of Attorneys

In the advocacy role, attorneys customarily allow the client to define the goal of the attorney's efforts, zealously advancing the client's position. In **PAS** cases, this approach may not be in the client's or the child's best interest, especially when the attorney is representing an alienating parent or a fully alienated child. Waldron and Joanis observed, "The lawyer for the **AP** [Alienating Parent] has a difficult role. The **AP** has collected evidence and invested time and energy in his or her role and has rectitude and certainty on his or her side, or so he or she believes. The **AP** wants badly for the lawyer...to agree with him or her. The lawyer has been hired, however, for his or her knowledge and judgment" (54; p. 130). Waldron and Joanis recommend that attorneys who represent such parents should advise their clients to terminate the behavior, in the best interest of their case. Furthermore, "When an attorney...has been appointed to represent the interests of the child...this attorney needs to avoid being swept up in the seductive process of **PAS** and remain neutral, with a focus on concrete evidence" (54; pp. 130-131). Sanders, who primarily represents rejected / alienated parents, recommends that before taking action, the attorney should determine whether the client is the problem, interviewing collaterals, obtaining a polygraph, or asking the client to undergo an independent psychological evaluation if necessary (30). Similarly, Ward and Harvey assert, "It is incumbent on the attorney to sufficiently explore the client's motivation and the reality basis of the client's beliefs before litigation is undertaken" (49; p. 35).

Psychological Experts in Divorce

According to Sanders, attorneys representing target parents in **PAS** cases must retain a strong psychological expert (30). For judges unfamiliar with **PAS**, the expert's role in educating the court is essential. Otherwise, the judge will most likely make orders which are not strong enough to remedy the problem. This is especially true for judges who are unfamiliar with family law cases and do not have a particular interest in that area. In some jurisdictions in California, including Alameda County

where Judge Nakahara presides, judges are assigned to the family law bench for a one year. Certain states, such as Colorado, do not have a family court system. Judges in some districts can be assigned to family law cases that they do not want, and their motivation to read custody reports and be alert to alienation issues may be minimal (50).

Sanders reported that when an alienated father is seeking custody, he should have a psychological expert who is prepared to give a strong opinion on the severity of the problem and the improbability that individual therapy for the mother or a restraining order against alienating behavior will be enough to remedy the situation (30). It may be crucial to persuade the court that the child's relationship with the target parent cannot be repaired unless custody is removed from the alienating parent.

Waldron and Joanis identified the danger in **PAS** cases of the professionals who become involved becoming as split and contentious as the parents (54). When possible, they recommend that mental health professionals who become involved work collaboratively with each other and with the attorneys. Depending on the circumstances, it may be possible for an expert who enters the case on the side of one parent or the other to eventually become part of the case management team, especially if the court orders it, as in the case vignette of S, above.

Ackerman and Kane included a section on **PAS** in the 1991 supplement to their reference work on psychological experts in divorce and other civil actions (59). In a subsequent edition, information about Gardner's work on **PAS** was included in the body of the text (60). Attorneys involved in difficult family law cases must be able to critically assess the qualifications and work of mental health professionals. Family lawyers may be expected to cooperate and participate in the selection of a custody evaluator, case manager, or therapist for the child. Attorneys must also be prepared to probe the findings of mental health professionals and to cross-examine them.

Family Law Versus Dependency Court

Decisions by the court in family law are based on "best interest of the child," usually interpreted to mean that children are better served when the court makes orders which enable them to maintain a positive relationship with both parents. There is also support for the rights of the parents to have a relationship with their children. The dependency system is designed to find abuse and to protect children from parents thought to be abusing them. In dependency or juvenile court proceedings, the state acts to protect children who are deemed to be at risk of being harmed, with the court assuming the role of the custodial parent. The juvenile court has the power to order a child taken into protective custody prior to a hearing and can terminate parental rights. The juvenile court may take jurisdiction in a family law matter even when the allegations of abuse have been previously litigated in family law court and found to be invalid (61).

Some alienating parents succeed in mobilizing the child protection system (CPS) to help sever the target parent's contact with the child. This is what happened in the case vignette of Mr. and Mrs. C in Part I. The case was unusual for the fact that the alienating parent was a father. He obtained custody of his daughter in dependency court after failing to accomplish this goal during several years of family law proceedings. Most of the CPS workers who became involved rejected the idea of **PAS**, despite information from mental health professionals who had been recognized by the family law court or who had provided therapy to the girl and her mother. As this case demonstrates, CPS workers tend to be less familiar with the dynamics of high conflict divorce. They are less likely to consider such potentially contaminating factors as parental influence and repeated abuse interviews of the child by police, social workers, therapists, and others. In severe alienation, the alienating parent may move from one county or state to another, beginning a new round of investigation into the abuse allegations and seeking better support for terminating the target parent's contact with the child (52).

On the other hand, when CPS workers are receptive to the experts' diagnosis of **PAS**, CPS can help contain the alienating parent's behavior, as the following case illustrates.

Mr. H successfully alienated his 11-year-old son and 9-year-old daughter from their mother after learning of mother's desire to divorce. Prior to the separation, mother was the primary parent. A court ordered custody evaluation found her parenting ability to be average. Father and the children used mother's new significant other as a rationale to vilify her.

The siblings played off each other and supported each other's extreme and hysterical protestations of hatred against their mother. The children did not see their mother for a year. A Special Master was appointed who referred the family to a **PAS** expert for treatment. When the therapist informed the children of his intention to hold a conjoint counseling interview with them and their mother, the 11-year-old boy became physically ill. Despite the therapist's efforts to persuade father and children of the need for a meeting with the mother, they refused to participate. The Special Master ordered such a meeting and still father refused.

Finally, the **PAS** therapist contacted CPS and made a suspected child abuse report against the father for severe psychological abuse in conjunction with his alienating behavior. The social worker who talked to the father and children was supportive of the therapist's concerns and agreed to back him up. The therapist, too, met with the father. He told Mr. H his reasons for the suspected abuse report and informed him that CPS was prepared to intervene, possibly removing the children from his home, if he did not turn the **PAS** situation around within a few months. The therapist gave Mr. H Gardner's book on **PAS** to read and told him that he was acting in this manner with his children. When father tried to tell the children that they had to rebuild their relationship with their mother and begin visitation, the children became angry and combative. Father became frightened that he would have problems with CPS and might be dragged into family law court by the children's mother. Mr. H worked harder to turn the situation around. The CPS worker met with the children twice and continued to advise father of the gravity of CPS' concerns. Soon, the children were able to begin visitation with their mother every other weekend. After several months, visitation was increased to every other week with each parent. Father needed a great deal of support to remedy the situation and mother was in a position to help him. As a result, a moderate degree of coparenting became possible and CPS formally closed the case. At two year follow-up, the children were doing well with both parents, a "win-win" solution for everyone involved, due to the willingness of CPS to work with the **PAS** expert.

Criminal Proceedings Against a Falsely Accused Parent

A parent falsely accused of some criminal act in the context of a divorce / custody dispute is at risk for prosecution. Like the juvenile court, criminal courts are unlikely to be familiar with the dynamics of high-conflict divorce and **PAS** (29). In the following case vignette, the accused father was an officer in the military. Testimony on **PAS** by the defense psychological expert provided the judge and jury with some alternative explanations as to the reasons the children accused their stepfather of abuse.

Mr. B was court-martialed after being accused, in the context of divorce, of molesting his wife's 10- and 14-year-old daughters from another marriage. Mrs. B and the girls accused Mr. B after Mrs. B learned of her husband's second infidelity. A similar sequence took place two years earlier when Mrs. B discovered an infidelity. At that time, Mrs. B moved out temporarily and called authorities to report that Mr. B was sexually abusing her daughters. On that occasion, Mrs. B decided to move back in with her husband and withdrew the accusations.

The military defense attorney retained a psychologist with expertise in **PAS** to testify at the criminal trial. The judge ordered the girls and their mother to participate in an evaluation by the defense expert. The military flew the family across the country several days before the trial in order for this to occur. A female pediatrician in the military, who planned to testify for the prosecution, accompanied the girls and their mother to the defense psychologist's office. The pediatrician remained in the waiting room and conversed with the family members and the psychologist at different break points in the evaluation. The **PAS** expert ascertained that the girls were very attached to Mr. B prior to their mother filing for divorce.

The biological father ran off when the girls were very young and Mr. B raised them as his own. The molestation accounts given by the girls contained numerous inconsistencies and were not supported by medical evidence. Documents reviewed by the **PAS** expert also indicated that the children's account had become more and more exaggerated with time. In the course of the day at the defense expert's office, the number of incidents reported by the girls went from the six counts with which Mr. B was originally charged, to more than forty-five.

The court permitted Mr. B's expert to testify in regard to **PAS** with false allegations of abuse. The jury found that the facts of the case conformed to the defense expert's opinion, and the stepfather was found not guilty.

Points and Authorities for the Admissibility of PAS Testimony

California attorney Patrick Clancy posts his Points and Authorities for the Admissibility of **PAS** Testimony on his web site, <http://www.accused.com>. The brief argues that testimony regarding Parental Alienation Syndrome is necessary to establish a child's motive to fabricate, and that such a motive is not readily apparent to the layman. Case law supports the right of a parent / defendant who is charged with molesting his child but maintains his innocence to establish motives other than his misconduct for the child to hate, fear or falsely accuse him. The prosecution in a murder trial, *People v. Phillips*, was allowed to introduce evidence of Munchausen Syndrome by Proxy (MSP) as a possible motive for the mother in killing her child. According to Clancy the defendant / parent accused of abuse has a stronger case for the admissibility of **PAS** testimony than the prosecution's case for the admissibility of testimony in regards to MSP. The family court *In Re Anne P.* gave tacit recognition of **PAS**, finding that the allegations of abuse against the father were false and that the mother was responsible for the allegations, by virtue of her mental disturbance and her unrelenting struggle with the father. Within the year, mother contacted CPS and eventually a dependency petition was filed. In this case, the juvenile court upheld the findings of the family court, attributing the allegations to mother's "pure out and out hatred....antagonism" toward the father.

List of PAS Case Citations in Dr. Gardner's Web Site

A list of case citations involving **PAS** can be obtained from Dr. Gardner's web site. The list is not necessarily up to date or exhaustive. Dr. Gardner's address on the World Wide Web is: <http://www.rgardner.com/refs>.

FORENSIC EVALUATION AND PAS

Custody Evaluators on PAS

Kopetski reported on 84 serious **PAS** cases from a sample of 413 court ordered custody evaluations in Colorado (63). The assessments were conducted by the Family and Children's Evaluation Team (FCET), of which Kopetski was a member. Their protocol included structured interviews of each

parent, obtaining developmental histories for the children, observations of parent-child interaction and individual evaluation of the child. Beginning in 1988, formal psychological testing of the parents was performed for all cases in which there were allegations of abuse, neglect, or a parent was seeking to restrict or exclude the other parent's contact with the child. Prior to learning of Gardner's work, the team independently came to very similar conclusions. Kopetski characterizes **PAS** as a form of psychosocial pathology in which a parent psychologically exploits the child and appropriates social systems in order to achieve alienation. The team's formulations reflect a social influence model and Clawar and Rivlin's work is referenced. Bowlby's attachment theories were found to be the most useful for understanding **PAS**. The team concurred with Bowlby's observation that "strong" or "intense" parent-child attachments are not necessarily healthy ones.

In 18 percent of FCET's **PAS** cases, the alienating parent was successful in preventing the children from having a relationship with the target parent in spite of recommendations against alienation. "One of the most surprising and discouraging findings in this survey was that in 15 families in which a parent was successfully alienated, the alienation was supported by a therapist on the basis that the child should not be separated from a 'symbiotic relationship' [with the alienating parent], even though the 'symbiosis' proceeded far beyond the time when such a parent-child relationship could even remotely be considered. It was as though the therapists had joined the delusion that the child could not survive if separated from the symbiotic parent" (63; p. 13). Unlike Johnston who has been supporting the idea of allowing children to remain in such relationships (9, 10), Kopetski and her colleagues recommend placing the child with the parent who has the most potential for promoting the child's psychological and social development.

Nicholas, a psychologist who practices in California, conducted a survey of custody evaluators about **PAS** (64). Twenty-one completed surveys were obtained. He sought to determine whether there was a constellation of identifiable signs and symptoms in the alienating parent, target parent and the child which, occurring together, could be said to constitute a syndrome as Gardner suggests. For the purposes of the survey, Nicholas defined **PAS** as the conscious or unconscious attempt by one parent to program or coerce a child against the other parent; whether or not any notable negative feelings, attitudes or behaviors were observed in the child. Parent alienating behaviors were found to be highly correlated with children's alienation symptoms and vice-versa. There were no significant correlations between the child's alienation symptoms and 8 of 10 target parent characteristics. Significant correlations were found, however, between child alienation symptoms and two target parent items: 1) withdrawing or temporarily giving up on the child and 2) becoming irritated and angry with the child for exhibiting the alienating behaviors. The findings of Nicholas' survey lend support to Gardner's contention that the core dynamic in **PAS** is between the alienating parent and child, and that the target parent's behavior is much less likely to be a major contributing factor. The majority of evaluator / respondents in Nicholas' survey reported that in about one-third of their custody evaluation cases, one parent was engaging in identifiable alienating behavior. In about one-fourth of cases, evaluators' recommendations were affected by the alienating parent's behavior.

According to Stahl, another California psychologist, **PAS** is one of the most complex issues custody evaluators may be called upon to assess, along with allegations of spousal or child abuse and parent requests to relocate (65). He is working on a new book with more extensive discussion of **PAS**. Hysjulien, Wood, and Benjamin devoted special sections to **PAS**, domestic violence and sex abuse allegations in their review of methods commonly used by custody evaluators, including interviews and psychological tests (66). There is no data which establishes the reliability and validity of such interviews, which are often quite informal and semi-structured.

Psychological tests which are used for the assessment of individual patients in clinical settings cannot be considered reliable and valid for the evaluation of family systems in forensic settings.

Stahl opines that many custody evaluations are not geared to adequately diagnose the pathology of an alienating parent and the complex family interactions which produce **PAS** (65). This results in recommendations which are too short-sighted for the true level of family dysfunction. He recommends that evaluators go beyond the confines of the individual, clinical assessment model and utilize more comprehensive, sophisticated methods, such as critically analyzing case material from a longitudinal perspective and comparing information provided by the parties during interviews with data from other sources.

Like **PAS**, Munchausen syndrome by proxy (MSP) is a complex psychosocial disorder which involves a number of individuals. Assessment models being developed for MSP are more specially designed to assess issues of parental manipulation and deception, pathological parent-child relationships, and the recruitment by parents of professionals as “third party participants” in the parental agenda (13, 67). Complex deceptions by one or both parents in high conflict divorce pose serious challenges to the legal system (17, 18).

In an effort to upgrade and standardize the conducting of custody evaluations, the American Psychological Association (APA) published *Guidelines for Child Custody Evaluations in Divorce Proceedings* in 1994 (68). *The Parental Alienation Syndrome: A Guide for Mental Health and*

In an effort to upgrade and standardize the conducting of custody evaluations, the American Psychological Association (APA) published *Guidelines for Child Custody Evaluations in Divorce Proceedings* in 1994 (68). *The Parental Alienation Syndrome: A Guide for Mental Health and Legal Professionals* was one of three books by Gardner listed under pertinent literature. Montgomery expressed concern that custody evaluators were not using the APA guidelines and that this was contributing to serious decision errors in assessment and intervention with **PAS** and other high conflict cases (58). She pointed out that attachment theories derived from work with young children are being misused by custody evaluators to predict outcome for older children, another source of error. Like Kopetski's group, Montgomery expressed the view that attachment theory is of ten biased towards mothers and fails to take into account the fact that even young children will attach to multiple caregivers when the environment provides such opportunities and the child is encouraged to do so. In severe **PAS** cases, Montgomery endorses the type of intervention strategies which Gardner proposes, e.g., placing the child with the target parent for several months.

According to Jones, Lund and Sullivan, who practice psychology in California, the protocols which Gardner prescribes for custody evaluations (48) enable evaluators to gain an in-depth picture early in the assessment process (52). These presenters use Gardner's diagnostic criteria for identifying **PAS** and believe it is important to educate the court about this diagnosis so that the court will deliver the appropriate legal intervention. However, they reserve the label **PAS** for severe cases, using “parental alienation” for lesser manifestations. Jones, Lund and Sullivan are conservative about recommending change of custody as an intervention but have occasionally done so in severe **PAS** cases. Sullivan classified alienating parents into “early and late starters”. Early starters are those who begin generating the alienation dynamic early in the marriage. Late starters activate the alienation dynamic in response to a trigger event such as the separation and divorce process. Jones commented on the fact that severe parental alienation is a form of child abuse, especially when false allegations of abuse are involved.

Forensic Assessment of Sex Abuse Allegations

Gardner's work on **PAS** is frequently referenced in the literature on assessing allegations of sexual abuse (69-74). In the context of divorce, **PAS** is one of several possible explanations for abuse accusations. Mapes asserted that any professional conducting forensic assessments of alleged sex

abuse, not just in family law proceedings, should be knowledgeable about **PAS** as a possible motivating factor for false allegations (75). The need for such knowledge is demonstrated in two of the case vignettes above, in which **PAS** was the cause of false allegations of abuse in juvenile court and criminal proceedings. According to Garbarino and Stott, adult misinterpretation and misunderstanding of children's statements has reached crisis proportions in legal proceedings of all kinds (16).

CONCLUSION

Parental Alienation Syndrome appears to be pervasive. The audience response during a recent presentation at the Second World Congress on Family Law made it clear that **PAS** is a social problem in other countries such as Canada and Australia (58). The probable range of variations in the presentation of **PAS** is likely to change according to the opportunities and limitations of the complex network of people and agencies who become involved. Outside social systems variously have the capacity to help ameliorate **PAS** or to further solidify it. When alienation becomes complete, it can amount to a de facto termination of parental rights. This includes the fact that **PAS** children experience the loss of nuclear and extended family, in addition to other long-term, detrimental effects. The judgments that courts and professionals make are difficult, complex and have far reaching consequences. Part III will explore the decision making process with respect to diagnostic issues and intervention strategies.

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Note to all Dads from Gordon, the DAD who OCREd this lovely article.

If you can not find the "Bullets" in this article to sue your Ex for **Child Abuse, the Government for **flagrant neglect** of their obligations to protect your children or the Expert Witnesses for recommending the mother **continues** to have custody, in your Case, then you had better jump in the river.**

This is assuming you have the funds to fight a legal battle after loosing every court case, to protect your children.