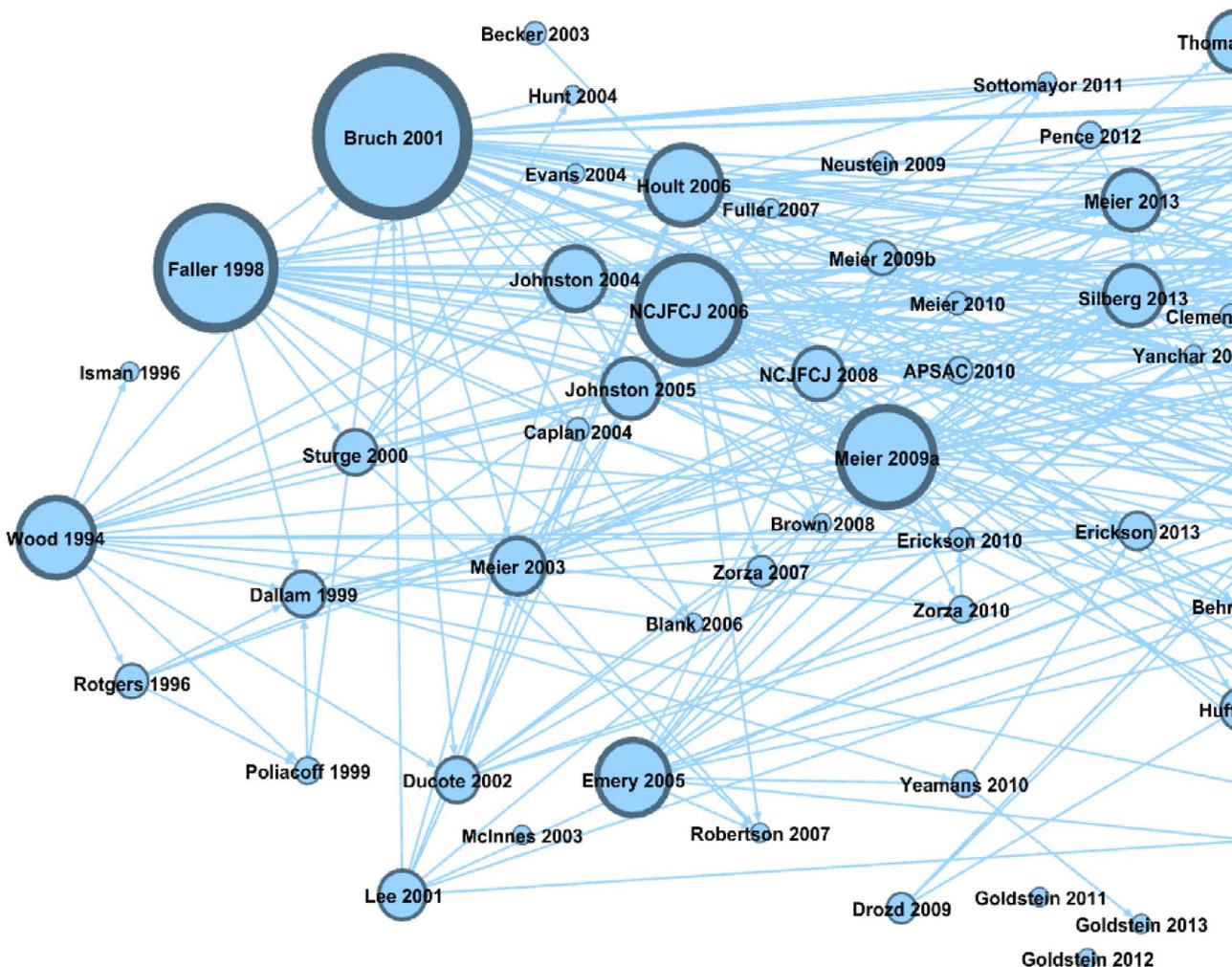


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Scholarly rumors: Citation analysis of vast misinformation regarding parental alienation theory

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Abstract

Misinformation is widespread in political discourse, mental health literature, and hard science. This article describes recurrent publication of the *same misinformation* regarding parental alienation (PA), that is, variations of the statement: "PA theory assumes that the favored parent has caused PA in the child simply because the child refuses to have a relationship with the rejected parent, without identifying or proving alienating behaviors by the favored parent." Ninety-four examples of the same misinformation were identified and subjected to citation analysis using Gephi software, which displays the links between citing material and cited material. The recurrent misinformation reported here is not trivial; these statements are significant misrepresentations of PA theory. Plausible explanations for this trail of misinformation are the psychological mindset of the authors (i.e., confirmation bias) and the authors' writing skills (e.g., sloppy research practices such as persistent use of secondary sources for their information). The authors of this article recommend that publications containing significant misinformation should be corrected or retracted.

KEYWORDS

citation analysis, disinformation, misinformation, parental alienation theory, retraction

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[Scholarly rumors involve] a cohort of scholars who misquote research and then quote one another, without checking back to the original source. This is a problem typically caused when authors who have strong ideological or activist views rely primarily upon secondary data sources The rumor may begin when there is simply some misunderstanding and miscommunication of research findings, or it may originate in more egregious use of strategies that discredit others' research findings.

Janet R. Johnston (2007, p. 18)

1 | INTRODUCTION

This insightful definition by Janet R. Johnston aptly describes the topic of this article. The scholarly rumor documented in this research consists of 94 false statements pertaining to parental alienation (PA), which occurred in peer-reviewed journals, government documents, legal briefs, books intended for professional audiences, and presentations at national conferences over a period of almost 30 years. The remarkable feature of these data is that the *same misinformation* was passed down from one author to the next author to the next author—almost all PA critics—thus relying on secondary sources rather than on the original writings of PA scholars.

This article is included in a special issue of *Behavioral Sciences & the Law*, which pertains to advances in forensic psychiatric assessment. This research relates to the assessment of PA in both clinical and forensic settings. Although there have been advances in the systematic identification of PA—such as the introduction of the Five-Factor Model for the diagnosis of PA (Bernet, 2022)—it will be hard to apply these new approaches if there is widespread misunderstanding regarding basic principles of PA theory.

1.1 | Misinformation landscape

During a time when public trust in institutions is trending downward due to the influence of misinformation, public trust in scientists has recently been described as “somewhat tepid” (Funk, 2017, p. 86). Scientific misinformation about climate change, vaccines, food production, and pharmaceutical products flourishes in social media, entertainment news, and the internet. It is remarkable that not only is misinformation abundant on the internet, it is often more popular than accurate information (Wang et al., 2019). A recent article (Kupferschmidt, 2022) in *Science* with a provocative title—“On the Trail of Bullshit”—describes the work of biologist Carl Bergstrom and his colleagues in identifying and suppressing misinformation and disinformation. For example, West and Bergstrom (2021) said, “Misinformation has reached crisis proportions. It poses a risk to international peace, interferes with democratic decision-making, endangers the well-being of the planet, and threatens public health” (p. 1). This issue has significant implications for topics that traverse psychology, law, and the resulting public policy.

Wardle and Derakhshan (2017)—in a report for the Council of Europe—developed a comprehensive, interdisciplinary understanding of misinformation and what to do about it. They introduced a new term, *information disorder*, which has three components: the agent (the individuals or groups that created, produced, and distributed the misinformation), the message (its type of communication, format, and characteristics), and the interpreter (the person who read the message, their interpretation of the message, and the action they took). For the purposes of this article, the most important component is the recipient of the message and how they are influenced by “motivated cognition, which refers to the unconscious tendency of individuals to process information to fit conclusions that suit some internal goal” (p. 44). Whether or not the receiver believes misinformation depends on a number of factors, such as the reputation of the source, the apparent intent of the source, the repetition of the message by multiple sources, the plausibility of the message, and, of course, confirmation bias. As people position themselves in information silos, they are more likely to encounter misinformation that personally appeals to them, and they are more likely to believe it.

The research reported here operates from the perspective that any one piece of scientific literature is not isolated. Scientific literature consists of the body of the scientific work and the references that reflect the author's

engagement with certain ideas, methods, and techniques proffered by other authors. The citing behavior of authors is an indisputable part of scientific communication. These references trace the history of scientific development; they can also trace the history of misinformation.

In a classic article in the *Encyclopedia of Library and Information Sciences*, Weinstock (1971) identified 15 reasons authors cite other authors' work, such as "paying homage to pioneers" and "correcting the work of others" (p. 19). Any scientific study must be based on the achievements of predecessors, so it is important for authors to acknowledge and respect the labor of others. Within that realm, scientists are trained to cite both supporting and opposing findings or perspectives within a certain discipline since both pros and cons contribute to the broader conversation of scientific knowledge.

Taken together, the reasons and motivations for citing, failing to cite, or improperly citing the works of others provide the basis for why misinformation threatens scientific objectivity. By studying the citation relationship among sources of misinformation, scientists will be better equipped to combat the root of misinformation, understand the motivations to disseminate it, and provide recommendations for dealing with this problem. It is hoped the current study can provide a template for other researchers at the intersection of law and psychology to investigate and deal with this problem. To demonstrate this process, the current study investigates the origins and repetitions of misinformation in citations concerning PA theory.

1.2 | Parental alienation theory

Parental alienation is a mental condition in which a child—usually one whose parents are engaged in a high-conflict separation or divorce—aligns strongly with one parent (the favored parent) and rejects a relationship with the other parent (the alienated parent) without a good reason. The most common cause of PA is the child's indoctrination by the favored parent to dislike or fear the alienated parent (Bernet, 2020a, pp. 5–6), although it is possible that some other person—such as a grandparent or a therapist—has influenced the child to reject a parent.

Parental alienation syndrome (PAS) was identified by Richard Gardner (1985) in *The Academy Forum*, a journal of news and opinion published by the American Academy of Psychoanalysis. Subsequent writers have generally referred to PA rather than PAS. The basic principles of PA theory are widely accepted among mental health and legal professionals who deal with child custody disputes and related aspects of family law. For example, at a national conference of the Association of Family and Conciliation Courts, a survey of attendees found that 98% of respondents agreed that, "Some children are manipulated by one parent to irrationally and unjustifiably reject the other parent" (Baker et al., 2011). Also, several studies of mental health professionals have shown that forensic and clinical practitioners generally accept the reality of PA and that they identify PA in some of their clients (Baker, 2007; Bow et al., 2009; Cox, 2010). PA theory has also been widely accepted in legal settings. Lorandos (2020) analyzed 34 years of published opinions of trial and appellate courts in the United States; he found 1181 cases in which PA was found to be material, probative, relevant, admissible, and discussed in a trial. The research by Lorandos primarily considered appellate cases, so the number of trial cases involving PA would have been much higher.

A recent survey of child custody evaluators revealed a strong level of endorsement regarding terminology related to PA theory, such as the definitions for "contact refusal," "parental alienation," "estrangement," "alienating parent," "alienated parent," and the "Five-Factor Model" for the diagnosis of PA (Bernet et al., 2022). Thus, there appears to be general agreement regarding the criteria for the diagnosis PA. The components of the Five-Factor Model are: (1) the child manifests contact resistance or refusal; (2) the presence of a prior positive relationship between the child and the rejected parent; (3) the absence of abuse, neglect, or seriously deficient parenting on the part of the rejected parent; (4) the use of multiple alienating behaviors (ABs) on the part of the favored parent; and (5) the child exhibits many of the eight behavioral manifestations of PA (Bernet & Greenhill, 2022).

The differential diagnosis of contact refusal includes PA, among other possibilities, such as a child's normal preference of one parent over the other; severe loyalty conflict; a child avoiding a loyalty conflict by gravitating to the side

of one parent; a child with separation anxiety; an unusually stubborn child who objects to their parents' divorce; child maltreatment, as seen in parental estrangement; and shared delusional disorder (Freeman, 2020). Furthermore, the diagnosis of PA requires the identification of specific ABs by the favored parent; that is, the existence of an alienating parent cannot be assumed or inferred simply because the child manifests contact refusal. This feature of PA theory was clearly stated by Baker (2020):

[N]ot all children who reject a parent are alienated, that is, have been exposed to alienating behaviors (ABs) on the part of the favored parent that foster their unjustified rejection of the other parent. ... Nowhere is it written in any legitimate treatise that all rejecting children are alienated.

(p. 208)

Thus, PA theory holds that ABs (by the favored parent) and behavioral signs of PA (in the alienated child) are each necessary but not sufficient for a diagnosis of PA. It is possible for a child to manifest contact refusal, but not be alienated; it is common for children to experience ABs by Parent A, but not reject a relationship with Parent B.

1.3 | Misinformation regarding parental alienation

The persistent, recurrent misinformation reported in this article was variations of the following statement:

Parental alienation theory assumes that the preferred parent has caused parental alienation in the child simply because the child refuses to have a relationship with the rejected parent without identifying or proving alienating behaviors by the preferred parent.

This recurrent misinformation is a serious false representation of PA theory. No PA scholar—since the seminal description of PAS by Gardner (1985)—has stated that all children who manifest contact refusal were indoctrinated to fear the rejected parent by the favored parent. Instead, every pertinent article or book chapter by a PA scholar explains that some children of high-conflict parents manifest contact refusal, which have several possible causes. Of course, PA is only one of the possible causes of contact refusal or resist/refuse dynamics.

1.4 | Research hypotheses

Based on what was already known about published misinformation regarding PA, two hypotheses guided the current research project: *First hypothesis*: An extensive review of PA literature will produce numerous examples of the *same misinformation*, that is, the notion that PA scholars assume that all instances of a child's contact refusal are caused by alienating activities of the favored parent. *Second hypothesis*: Citation analysis will demonstrate a continuous flow of the same misinformation from early publications to recent publications in the mental health and legal literature. This research project was examined by a university-based Institutional Review Board, which determined, "IRB approval is not required."

2 | METHOD

Widespread misinformation regarding PA—published in journal articles and presented at conferences for mental health and legal professionals—was previously described (Bernet, 2015, 2020b). In 2020, however, it was apparent that a recurrent pattern of the *same misinformation* was published and presented by several known PA critics (Geffner

& Sandoval, 2020; Johnston & Sullivan, 2020; Mercer, 2020; Milchman et al., 2020; and Sandoval & Geffner, 2020). It appeared that this specific form of misinformation had a history and may be widely believed by PA critics. While previous research documented the recurrent pattern of the same misinformation (Bernet, 2021), the current article explores the proliferation of PA misinformation more broadly and seeks to depict graphically the amount of misinformation and its method of expansion. It is hoped that this will serve as an example for other areas of study with a goal of combatting misinformation as it leaps between social media and scholarly literature.

This research project occurred in two stages. The first stage had two purposes: (1) to review the writings of known PA critics and work backward from recent publications to citations to earlier work to identify variations of this misinformation and (2) to search the literature for similar statements made by PA scholars, which would explain the occurrence of misinformation among the PA critics. The first stage of this research identified 40 articles or presentations between 1994 and 2020 in which a PA critic stated some version of the relevant misinformation; also, a few writings by PA scholars that could have been misunderstood or misconstrued to say that some practitioners diagnose PA simply based on the child's contact refusal without specifically identifying ABs by the favored parent. The results from the first stage of this research project—including 40 quotations of misinformation—were reported by Bernet (2021).

The second stage of this research project—reported here—also had two purposes. The first goal was to start with the earliest known example of this specific misinformation in Wood (1994), work forward to identify later documents that cited Wood, and continue with that iterative process to the present time. Articles and chapters and other documents containing the same misinformation were identified through Google Scholar and Web of Science. During both stages of this project, the authors located and reviewed approximately 400 articles, presentations, and other documents that pertained to PA; this process identified 94 documents containing the same misinformation. After the 94 documents were identified, they were reviewed manually to determine whether each document cited other documents with the same misinformation.

The additional goal during the second stage of this research project was to demonstrate through citation analysis that a continuous flow of the same misinformation occurred from Wood (1994) to the most recent examples of PA misinformation (Meier, 2021; Mercer & Drew, 2022). Citation analysis is a technique used in bibliometric research, which identifies and analyzes the relationships among a group of references (De Bellis, 2009; van Eck & Waltman, 2014). The relationships can then be presented visually, which reveal the flow of information from earlier publications to subsequent ones and other hidden patterns in the citation network. In this study, the data listed in Appendix A were used to construct a representation of *nodes* and *edges*, the components of a citation network. That is, each document was extracted as a node. Each citation relationship between two documents was extracted as an edge between the two nodes. A node list and an edge list were created and imported into Gephi software (Bastian et al., 2009) for analysis and visualization (Figure 1).

A directed citation network was created with edges pointing from the cited publications to the citing publications; the arrow direction of the edges represents the flow of the misinformation. This method of citation analysis is similar to what attorneys do when they “Shepardize” a case; they create the genealogy of a specific legal finding through several trials and appellate cases. In the citation analysis presented in this article, out-degree and betweenness centrality of all publications were calculated. Out-degree is the number of edges directed out of a node in a directed network. Betweenness centrality is the number of shortest paths in the network that pass through the node. To better visualize the misinformation flow, nodes were arranged based on the chronological order from the left to the right of the network.

3 | RESULTS

Research data are available online at the Center for Open Science (<https://osf.io/d83rw/>). Appendix A includes the 94 examples of recurrent misinformation. Appendix B lists the out-degree scores and betweenness centrality scores of

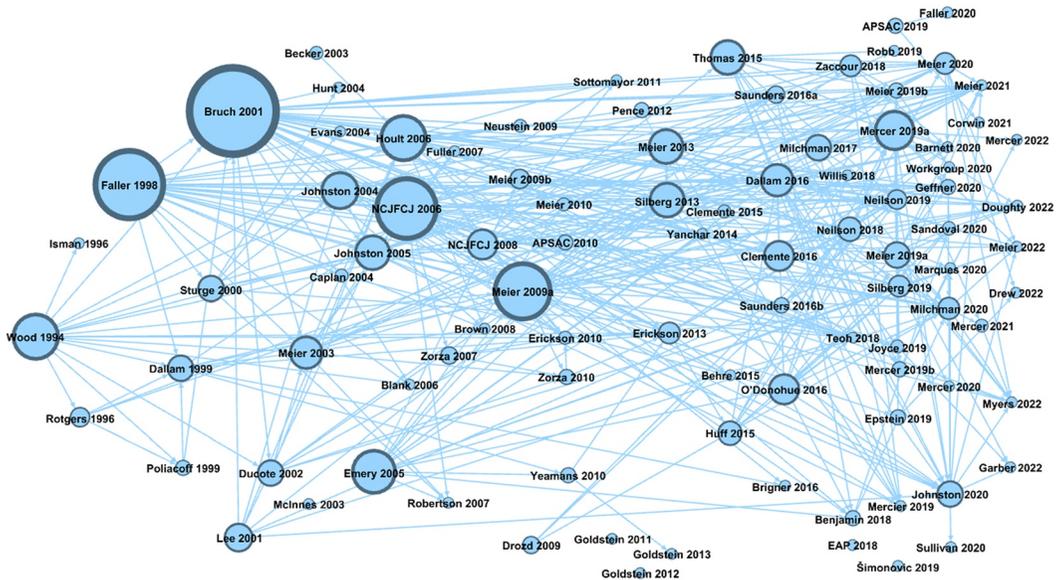


FIGURE 1 Citation analysis demonstrating a pattern of recurrent misinformation in journal articles, books, presentations, government documents, and legal briefs. Publications and other materials are indicated in chronological order from left (1994) to right (2022). Node size indicates out-degree score, the number of times an item is cited by subsequent items. Arrow direction of the edges represents the direction of the misinformation. Thus, the earliest example of misinformation (Wood, 1994) only has outgoing edges; the most recent examples (e.g., Doughty, 2022) only have incoming arrows [Colour figure can be viewed at [wileyonlinelibrary.com](https://onlinelibrary.wiley.com/doi/10.1002/jai.2095)]

each document. Appendix C is a visual representation of the citation network with node size representing betweenness centrality.

3.1 | Examples of misinformation

The current study greatly expanded the previous research on PA misinformation. Bernet (2021) identified 40 examples of the same misinformation published between 1994 and 2020. The current research identified an additional 54 examples published between 1996 and 2022, for a total of 94 examples of the same misinformation. Each example is listed in Appendix A (available online at <https://osf.io/d83rw/>), which includes the citation, the reference, a brief quotation of the misinformation, and previous articles containing the same misinformation that were cited by each reference in Appendix A. The *first hypothesis* (An extensive review of PA literature will produce numerous examples of the same misinformation.) was supported.

3.2 | Variation in expression of misinformation

While most of the examples of misinformation reported here constitute explicit, unambiguous repetition of the recurring false statement (i.e., the idea that PA scholars assume that all cases of contact refusal were created by ABs of the favored parent), a few examples cited are not explicit, but imply very strongly the same misinformation in their underlying premises. For example, Epstein and Goodman (2019) said: “Judges tend to conclude, typically with no evidence other than the perpetrator-father’s uncorroborated assertion, that women are fabricating abuse allegations as part of a strategic effort to alienate the children from their father” (p. 431). These authors were not directly discussing

PA theory, but were relating their understanding of how judges interpret PA theory. Although stating the notion in a roundabout manner, Epstein and Goodman were repeating misinformation regarding PA theory.

3.3 | Citation analysis

Out-degree centrality. This metric of the citation network refers to the number of times a publication is cited by subsequent publications. The flow of misinformation between 1994 and 2022 is presented visually using Gephi software, which exhibits the links between citing publications and cited publications (Figure 1). The genealogy of this scholarly rumor is clearly portrayed. The *second hypothesis* (Citation analysis will demonstrate a continuous flow of the same misinformation from early publications to recent publications.) was supported.

In total, there are 94 nodes (publications) and 411 edges (citations) in this directed citation graph. The size of the nodes in Figure 1 indicates the out-degree centrality (0–36) of the nodes, that is, the number of times the given publication is cited. Publications with high out-degree centrality are cited more often than others and are thus characterized as more influential. That is, the size of the nodes reflects the magnitude of their impact. The articles with the highest out-degree scores are Bruch (2001), Faller (1998), Dalton et al. (2006), and Meier (2009).

Betweenness centrality. This metric of the citation network measures how often a node appears on the shortest paths between nodes in the network. Publications with higher betweenness centrality scores play a more critical “bridge” role in the network of misinformation. In this study, there was a wide range of betweenness centrality (0–201.14) of the nodes. The articles with the highest betweenness centrality are Mercer (2019), Erickson (2013), Bruch (2001), Johnston and Sullivan (2020), and Meier (2009).

Appendix B (at <https://osf.io/d83rw/>) lists the out-degree centrality score and betweenness centrality score of each publication. Appendix C (at <https://osf.io/d83rw/>) provides a visual representation of the citation network with node size indicating the betweenness centrality score of each publication.

3.4 | Lack of relevant citation

The noted citations were found somewhere in the citing articles, chapters, and presentations; they were not usually associated with the sentence or paragraph containing the misinformation. In most of the examples discussed here, the authors provided no citation at all for the stated misinformation. When citations were provided, they did not support the claims made in the false statements.

Several authors cited books and articles by Richard Gardner: *Family Evaluation in Child Custody Evaluations* (1982), *The Parental Alienation Syndrome and the Differentiation between Fabricated and Genuine Child Sexual Abuse* (1987), *True and False Allegations of Child Sexual Abuse* (1992), *The Parental Alienation Syndrome: A Guide for Mental Health and Legal Professionals* (1992, 1998), “Differentiating between Parental Alienation Syndrome and Bona Fide Abuse–Neglect” (1999), “Family Therapy of the Moderate Type of Parental Alienation Syndrome” (1999), “Should Courts Order PAS Children to Visit/Reside with the Alienated Parent” (2001), “Parental Alienation Syndrome vs. Parental Alienation: Which Diagnosis Should Evaluators Use in Child Custody Disputes?” (2002), “Commentary on Kelly and Johnston’s ‘The Alienated Child: A Reformulation of Parental Alienation Syndrome’” (2004), and “The Three Levels of Parental Alienation Syndrome Alienators: Differential Diagnosis and Management” (2004). Although these authors mentioned books and articles by Gardner, they typically did not provide a specific page or location in the cited texts for the recurrent misinformation. Gardner was consistently misrepresented by these citations, since he never said that PAS/PA should be diagnosed simply based on the behavioral signs in the child, that is, contact refusal.

3.5 | Misinformation based on evaluation reports and testimony

Some PA critics acknowledge that the incorrect assertion identified in this research is not found in the published writings of PA scholars, but the critics say that the same premise occurs in custody evaluations prepared by PA scholars

and in their testimony in legal proceedings. For example, Meier (2003) said that this notion occurred “in cases with which I have been associated” (p. 711), rather than in material published by PA scholars. Meier and other PA critics have rarely identified specific PA scholars who make that error in their custody evaluations or testimony; if these individuals are ever identified, they should be contacted and advised to improve their understanding of PA theory.

3.6 | Prevalence of misinformation

The frequency of published and presented misinformation has increased in recent years (Figure 2). This increase is probably the result of greater discussion of this topic, for example, special issues of the *Journal of Child Custody* (2016, 2019), the *APSAC Advisor* (2020), and the *Family Court Review* (2020) regarding PA and a new book, *Challenging Parental Alienation*, devoted to criticizing PA theory (Mercer & Drew, 2022).

3.7 | “Assume” and similar words

A form of the words *assume*, *presume*, or *infer* occurred in 56 of the 94 examples of misinformation cited in this article. For example, “PAS theory simply *presumes* that a child's hostility toward a father is pathological and that mothers who make such allegations are doing so only to undermine the child's relationship with the father” (emphasis in original) (Meier, 2009, p. 236). The use of these words heightens the incorrect notion that PA scholars jump to the diagnosis of PA with minimal and inadequate information.

4 | POSSIBLE SOURCES OF MISUNDERSTANDING

The vast compilation of misinformation discussed here did not materialize out of thin air. It is possible that these recurrent false statements were prompted by misunderstanding passages in articles or books written by PA scholars.

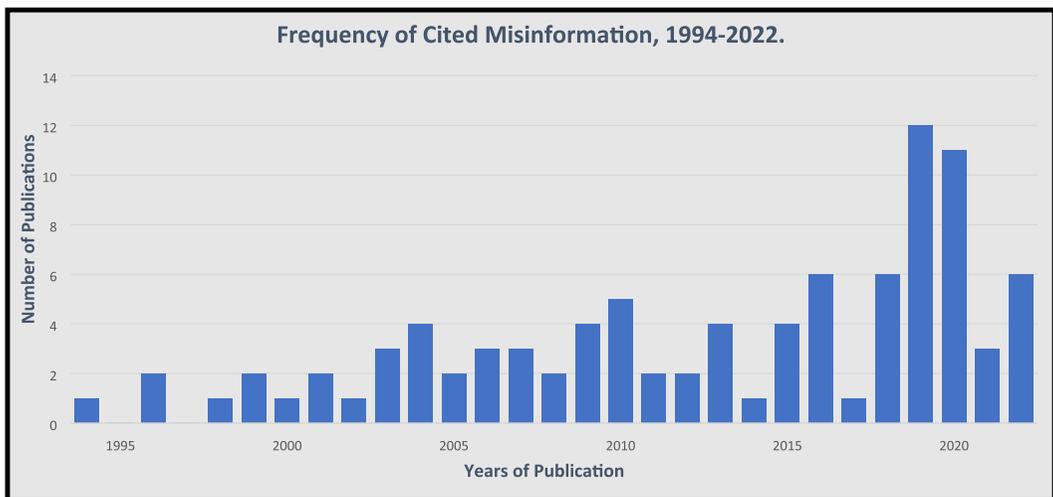


FIGURE 2 Frequency of cited misinformation, 1994–2022. Ninety-four articles, books, presentations, government documents, and legal briefs were identified with the same misinformation regarding parental alienation theory, published between 1994 and 2022. A large increase in the frequency of published misinformation occurred during 2019 and 2020 [Colour figure can be viewed at wileyonlinelibrary.com]

For example, an article by Dallam and Silberg (2016) illustrates how an important misunderstanding may have come about. They made the following statement, in which they cited a specific passage from Gardner:

Gardner's theory of parental alienation was based on the assumption that if a child rejects their parent (usually the father) after allegations of abuse, the other parent (i.e., the mother) must have brainwashed the child. As Gardner (1992) stated, "Children are not born with genes that program them to reject a father. Such hatred is environmentally induced, and the most likely person to have brought about the alienation is the mother" (p. 75). Thus, problems in the child's relationship with the father were simply blamed on brainwashing by the mother.

(p. 135)

Dallam and Silberg made the error of confusing Gardner's discussion of general principles regarding children's patterns of attachment to their parents with the procedure for evaluating the relationships in a specific family. In the passage they quoted from Gardner (1992, p. 75), he was saying, in effect: *In general*, children do not reject a parent unless some external force has influenced them to do so. *In general*, children who strongly reject a parent have probably been influenced to do so by the favored parent. Both those statements continue to be held by PA scholars. However, those statements do not mean that an evaluator of a specific family can make the "assumption" that every child who rejects a parent was influenced to do so by the favored parent. Instead, Gardner and all PA scholars would say that the favored parent's ABs must be identified and proven, not assumed, to have occurred. It is easy to see how Dallam and Silberg—if they had a preexisting negative bias toward Gardner and PA theory—could have misinterpreted Gardner's statements to suit their own misconceptions.

5 | DISCUSSION

This article demonstrates how pervasive misinformation plays out in the space where mental health and legal issues come together. The 94 statements cited in this article—made repeatedly by PA critics—are incorrect. The recurrent misinformation examined here is not trivial. These statements are significant misrepresentations of basic principles of PA theory. Also, the statements discussed in this article are not simply diverse opinions of professionals examining the same data; instead, they are factual errors. That is, the quotations from PA critics clearly misstate and misrepresent the writings of PA scholars. The quotations from PA critics, which were found in journal articles, government documents, books, and PowerPoint presentations, have not been twisted or taken out of context.

Furthermore, none of the writers quoted here provided an adequate source or a relevant reference for the misinformation they expressed; there is no source in the PA literature for the claims of these writers. While all the examples discussed in this article have been described as misinformation, it is possible that some of them constitute disinformation. *Misinformation* refers to false information that is spread, regardless of the author's intent to mislead the reader. On the other hand, *disinformation* refers to material that is deliberately misleading or biased; disinformation is spreading misinformation in a purposeful manner.

This article reports a pattern of recurrent false statements in psychosocial literature, which had not been previously recognized. This research suggests that a systemic flaw has occurred among the authors, peer reviewers, editors, and publishers of mental health and legal literature. There are at least three plausible explanations for this inescapable trail of misinformation: the first pertains to the psychological mindset of the authors and presenters (i.e., confirmation bias); the second pertains to the authors' writing skills (e.g., sloppy research practices, such as persistent use of secondary sources rather than original or primary sources for their information); and the third possible explanation for the epidemic of PA misinformation is the adoption of typical cognitive processes within PA families by evaluators and attorneys and other individuals in their social network.

Confirmation bias is one of many cognitive biases that have been identified and studied. Confirmation bias "describes people's tendency to focus on and look for information that confirms their initial hypothesis while ignoring

contradictory information or alternative explanations” (Neal et al., 2022, p. 102). Further, these notions are subject to the echo chamber effect, which is a widely studied phenomenon in misinformation research referring to an environment in which ideas and values get reinforced due to repeated interactions with peers or sources having similar tendencies and attitudes (Del Vicario et al., 2016). In this case, it is likely that PA critics previously had negative preconceptions regarding this topic (e.g., “PA theory is deeply mistaken.”), which prompts them to misinterpret a central principle of PA theory (e.g., “PA proponents assume all children who reject Parent B were indoctrinated by Parent A.”).

Regarding the second possible explanation for this recurrent misinformation, it is an easy short-cut for authors expounding a particular ideology to base their assertions on the writings of colleagues with a similar perspective. That means that a new article will be published based on secondary or even tertiary sources rather than on primary sources for its information. In the 94 examples of misinformation discussed here, some of them directly cited other PA critics as their source, thus propagating scholarly rumors. None of the authors quoted here correctly cited a PA scholar as their source of information regarding PA theory. This causes misinformation to proliferate quickly in this homogeneous and polarized research community.

The third possible explanation for the epidemic of PA misinformation is, perhaps, more speculative. That is, mental mechanisms within PA families involve strongly held false beliefs, that is, Parent A is convinced—wrongly—that Parent B is deficient in some way, unloving, and perhaps dangerous. Parent A actively conveys that false information to their children and to individuals within their orbit—such as family, friends, therapists, physicians, and attorneys. Some of those individuals identify with and adopt the mindset of Parent A. Mental health and legal writers who support Parent A's position may adopt the same mindset; they readily endorse misinformation about PA and convey that false information to their readers.

The underlying motivations of PA critics/detractors/deniers who have perpetuated this misinformation for almost 30 years are unclear. It appears that they have intended to make PA theory look flawed or even preposterous by repeatedly asserting that PA scholars believe something that sounds inherently absurd, that is, that evaluators assume that every instance of contact refusal is caused by an alienating, favored parent. However, there is no way to know what is happening in the minds of PA critics without engaging in open and transparent discussions with them.

5.1 | Public policy implications

Regarding public policy, Wardle and Derakhshan (2017) described how information disorder can be corrected and perhaps prevented at various levels of society: technology companies (e.g., work collaboratively and improve public discourse), national governments (e.g., commission research to map out information disorder), media organizations (e.g., debunk sources as well as content), civil society (e.g., educate the public), educational institutions (e.g., create a standardized literacy curriculum), and funding bodies (e.g., support programs that teach critical information skills). There are abundant opportunities to address this critical problem.

The concept *research-to-practice gap* refers to the chasm between scientific knowledge and innovation and the implementation of those advances in the everyday activities of the relevant practitioners (Rudd & Beidas, 2021). For example, it reportedly takes years for a healthcare innovation to make its way into routine clinical practice. The topic of this article is a good example of a research-to-practice gap: although there is a large volume of research and authoritative treatises on PA theory, there is also a vast amount of misunderstanding regarding PA, which has delayed the implementation of important scholarship into the everyday activities of child custody evaluators. This article hopes to illustrate *implementation science*, which refers to the “scientific study of methods to promote the systematic uptake of proven clinical treatments, practices, organizational, and management interventions into routine practice, and hence to improve health” (Eccles et al., 2012, p. 2). The recurrent misinformation reported in this article is a major roadblock for the widespread acceptance of PA theory. The optimistic goal of this article is to identify and correct the misunderstanding that has occurred over many years, which hopefully will make legitimate PA theory more available to practitioners, researchers, and policy makers.

5.2 | Overcoming misinformation

It is important to identify and implement methods for overcoming, counteracting, and correcting misinformation and misunderstandings that occur in literature intended for mental health and legal professionals. It is not necessary to reinvent the wheel in order to develop strategies to accomplish this task. There are three fields of study—regarding partisanship, denialism, and public health—that are sources of guidance.

Partisanship is the practice of strongly supporting a person, principle, or political party without necessarily considering or judging the matter carefully. Van Bavel and Pereira (2018) extensively discussed partisanship theory and its components—including psychological, sociological, and even neurological (“the partisan brain”) aspects. With regard to interventions to reduce partisanship, they recommend having access to actual information in order to create accurate beliefs regarding a topic. They also recommend reducing polarization by searching for common ground. Both of those strategies apply to the predicament described in this article. First, both PA critics and PA scholars should search for primary sources in discussing PA theory rather than relying on secondary and tertiary sources for their information. Second, it would be great for PA critics and PA scholars to collaborate in writing projects, presentations, and research regarding contact refusal, resist/refuse dynamics, and similar topics.

Denialism is the rejection of facts and concepts that are generally undisputed components of the scientific consensus on a subject, in favor of ideas that are controversial or fabricated. Common examples are Holocaust denial, AIDS denial, and climate change denial. One of the features of denialism is “the use of misrepresentations and logical fallacies,” such as red herrings and straw men arguments (Diethelm & McKee, 2009). The recurrent misinformation discussed in this article constitutes an army of straw men, in that PA critics have repeatedly made the same false claim regarding PA theory and then repeatedly criticized their fabricated version of the theory. Diethelm and McKee offer cogent advice for dealing with denialism:

It is important to recognize denialism when confronted with it. The normal academic response to an opposing argument is to engage with it, testing the strengths and weaknesses of the differing views, in the expectations that the truth will emerge through a process of debate. However, this requires that both parties obey certain ground rules, such as a willingness to look at the evidence as a whole, to reject deliberate distortions and to accept principles of logic.

(p. 3)

Regarding *public health*, the Surgeon General of the United States published a document, *Confronting Health Misinformation* (Murthy, 2021). In addressing this topic, Murthy said, “We need institutions to recognize that this issue is their moral and civic responsibility, too, and that they are accountable” (p.16). For example, he recommended that educational institutions can increase the use of evidence-based curricula that build resilience to misinformation, educate students on common tactics used by those who spread misinformation, and create quality metrics to assess progress in information literacy. The research reported here follows the guidance of the Surgeon General.

5.3 | Limitations

An inherent limitation of this type of research is that it presents only one side—the perspective of PA proponents—a complex field of study. Ideally, this type of literature review would be a joint effort of proponents and critics. In the future, it will be important for groups of scholars with diverse perspectives to communicate with each other and share proposals and hypotheses. If proponents and critics were to talk with each other, they would likely find that they agree on many aspects of PA theory. For example, both proponents and critics are concerned about domestic violence and all of us want to protect children from maltreatment. The purpose of the research reported here is not to generate debate and disagreement; rather, its purpose is to reach a common understanding of PA theory so that

collaboration and perhaps joint research projects can occur in the future. We realize that most scholars who write about PA—both pro and con—are not promoting misinformation, but are sincerely trying to understand a complex and serious psychosocial phenomenon.

5.4 | Future research

The next stage of this long-term research project will involve reaching out to some of the authors, journal editors, and organizations, whose work is cited in this article. In some instances, the cited misinformation is a small feature in an article that is otherwise accurate; in those cases, the publication of a corrected article will be appropriate. In other examples, however, the cited misinformation pervades the entire article or book chapter; in those cases, retraction of the article or book will be called for. Perhaps, a future article will report on these attempts to correct the literature regarding this important topic. In general, publishing companies and editorial staff must improve efforts to identify misinformation that is frequently attributed to PA theory and make efforts to correct or retract publications containing these false statements.

The research reported here pertained to peer-reviewed articles in mental health and legal publications, books that discuss PA theory, a few government documents, and four legal briefs. This literature review did not reach into the world of judicial opinions as reported by trial courts and appellate courts. It would be important to know whether the misinformation reported here has influenced judicial decisions in the United States and elsewhere. That is a likely scenario, since the largest propagators of this misinformation were law professors (Bruch, 2001; Hoult, 2006; Meier, 2009) and a professional organization for family court judges (Bowles et al., 2008; Dalton et al., 2006). If false statements have contaminated precedent setting decisions, that trend should be identified and addressed to prevent the spread of this misinformation from one legal case to another. That is a worrisome prospect, which legal scholars should investigate and correct in order to protect children and families from injury by future judicial decisions based on false information.

6 | CONCLUSION

This article reports an unusual bibliometric research project, which documents 94 examples of the same misinformation that occurred in mental health and legal literature and professional presentations between 1994 and 2022. Although the cited misinformation pertained to a rather narrow topic—a specific but important aspect of PA theory—the broader implications of this research relate to the integrity and scholarship of authors, peer reviewers, and editors. The misinformation spread from journal articles to presentations at national meetings, government documents, legal briefs, and even official policies of professional organizations. The research data—that is, the 94 quotations of misinformation in published articles and other sources—were subjected to citation analysis, which revealed an unbroken trail of misinformation from 1994 to 2022. The authors recommend that these false statements should be corrected or retracted by their editors and publishers.

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CONFLICT OF INTEREST

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SUPPORTING INFORMATION

Additional supporting information can be found online in the Supporting Information section at the end of this article.

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Scholarly Rumors: Citation Analysis of Vast Misinformation Regarding Parental Alienation Theory

Appendix A. Between 1994 and 2022, the *same misinformation* regarding parental alienation theory was published 94 times in journal articles, book chapters, professional presentations, legal briefs, and policy statements of professional organizations. APSAC = American Professional Society on the Abuse of Children. EAP = European Association for Psychotherapy. NCJFCJ = National Council of Juvenile and Family Court Judges. PAS = parental alienation syndrome.

EXAMPLES OF MISINFORMATION			ARTICLES CITED BY EACH EXAMPLE OF MISINFORMATION
Item Number — Short Citation	Long Citation	Misinformation Quotation	
01 Wood 1994	Cheri L. Wood (1994). The parental alienation syndrome: A dangerous aura of reliability. <i>Loyola of Los Angeles Law Review</i> , 27(4/5), 1367–1415.	“The list of explanations—which is illustrative rather than exhaustive—that provides reasons for children having such feelings furnishes some credible alternatives to the PAS theory that when the children have ill feelings toward their fathers, <i>their mother must be the cause</i> ” (emphasis added) (p. 1390).	None
02 Isman 1996	Danielle Isman (1996). Gardner’s witch-hunt. <i>UC Davis Journal of Juvenile Law and Policy</i> , 1(1), 12–15.	Gardner believes that <i>whenever</i> a child expresses dislike of or apprehension about contact with the father, and the mother is the primary care-taker, the reason for the child’s reservations about the father are caused by the mother’s abuse” (emphasis added) (p. 13).	Wood 1994
03 Rotgers 1996	Frederick Rotgers and Deirdre Barrett (1996). <i>Daubert v. Merrell Dow</i> and expert testimony by clinical psychologists: Implications and recommendations for practice. <i>Professional</i>	“Some practitioners have even been willing to engage in reverse logic and state that because an individual demonstrated a particular behavior pattern, trauma must have occurred. Wood (1994) has discussed at length the potential harm of such	Wood 1994

	<i>Psychology: Research and Practice</i> , 27(5), 467–474.	reasoning in an analysis of the Parental Alienation Syndrome (Gardner, 1992)” (p. 472).	
04 Faller 1998	Kathleen Coulborn Faller (1998). The parental alienation syndrome: What is it and what data support it? <i>Child Maltreatment</i> , 3(2), 100–115.	“A fundamental flaw in the syndrome, as described by Gardner (1992a, 1992c), is that it fails to take into account alternative explanations for the child’s and mother’s behavior, including the veracity of the allegation or that the mother has made an honest mistake” (p. 112).	None
05 Poliacoff 1999	Jerome H. Poliacoff, Cynthia L. Greene, Laura Smith (1999). Parental alienation syndrome: <i>Frye v. Gardner</i> in the family courts. <i>Family Law Commentator</i> (Florida Bar), 25(4), 19–20, 30–33.	“[Rotgers and Barrett] go on to cite Gardner’s PAS as the exemplar of ‘some practitioners (who) have been willing to engage in reverse logic and state that because an individual demonstrated a particular behavior pattern, trauma must have occurred’” (p. 3).	Wood 1994, Rotgers 1996
06 Dallam 1999	Stephanie J. Dallam (1999). The parental alienation syndrome: Is it scientific? In E. St. Charles and L. Crook (Eds.), <i>Expose: The Failure of Family Courts to Protect Children from Abuse in Custody Disputes – A Resource Book for Lawmakers, Judges, Attorneys, and Mental Health Professionals</i> (pp. 75–93). Los Gatos, CA: Our Children Charitable Foundation.	“PAS <i>assumes</i> that a child’s rejection of their father is caused by brainwashing by the mother without exploring the father’s possible contribution to problems in his relationship with his children” (emphasis added).	Faller, 1998, Wood 1994, Poliacoff 1999, Rotgers 1996
07 Sturge 2000	Claire Sturge and Danya Glaser (2000). Contact and domestic violence – The experts’ court report. <i>Family Law</i> , (February 2000), 615–629.	“The essential and important difference is that the Parental Alienation Syndrome <i>assumes</i> a cause (seen as misguided or malign on the part of the resident parent) which leads to a prescribed intervention ...” (emphasis added) (p. 622).	Faller, 1998

08 Lee 2001	S. Margaret Lee and Nancy W. Olesen (2001). Assessing for alienation in child custody and access evaluations. <i>Family Court Review</i> , 39(3), 282–298.	With PAS as described by Gardner (1987), “[O]ne parent is identified as engaging in alienating behavior and/or the child is resisting visits. This conclusion <i>infers</i> causality and leads to a set intervention strategy. In the most disturbing situations of PAS, it is reasoned that when one determines that a child is alienated, it follows that a parent is engaged in brainwashing” (emphasis added) (p. 283).	None
09 Bruch 2001	Carol S. Bruch (2001). Parental alienation syndrome and parental alienation: Getting it wrong in child custody cases. <i>Family Law Quarterly</i> , 35(3), 527–552.	“PAS shifts attention away from the perhaps dangerous behavior of the parent seeking custody to that of the custodial parent. This person, who may be attempting to protect the child, is instead <i>presumed</i> to be lying and poisoning the child” (emphasis added) (p. 532).	Wood 1994, Faller 1998, Poliacoff 1999, Lee 2001
10 Ducote 2002	Richard Ducote (2002). Guardians ad litem in private custody litigation: The case for abolition. <i>Loyola Journal of Public Interest Law</i> , 3, 106–151.	“[PAS] posits that when children display fear of one parent, typically the father, report abuse by that parent, and exhibit symptoms of trauma such as sexual abuse, the real culprit is the child’s mother who ‘programmed’ the child into this damaged relationship” (p. 141).	Wood 1994, Bruch 2001
11 Becker 2003	Mary Becker (2003). Access to justice for battered women. <i>Washington University Journal of Law & Policy</i> , 12(1), 63–98.	“[PAS] is in large part the creation of one man, Richard A. Gardner, who says that when children are alienated from one parent, the explanation is inappropriate behavior by the parent to whom the children remain close” (p. 90).	None
12 McInnes 2003	Elspeth McInnes (2003). Parental alienation syndrome: A paradigm for child abuse in Australian family law [Paper presentation]. Conference of the Australian Institute of	“PAS begins from the premise that children who allege serious abuse by a parent are lying and that they are made to lie by an apparently protective parent. ... Children’s complaints of harm by a	None

	Criminology, Adelaide, Australia, May 1–2, 2003.	parent are, within the logic of PAS, proof that the child is subject to PAS by the other parent” (p. 4).	
13 Meier 2003	Joan S. Meier (2003). Domestic violence, child custody, and child protection: Understanding judicial resistance and imagining the solutions. <i>American University Journal of Gender, Social Policy & the Law</i> , 11(2), 657–732.	“In cases with which I have been associated, when the children voiced a preference not to see their father, or otherwise indicated troubling behaviors by the father, the courts and forensic professionals <i>presumed</i> they were ‘programmed’ by their alienating mother” (emphasis added) (p. 711, FN 193).	Wood 1994, Faller 1998, Bruch 2001, Ducote 2002
14 Hunt 2004	Joan Hunt and Ceridwen Roberts (January 2004). <i>Child Contact with Non-resident Parents. Family Policy Briefing 3</i> . University of Oxford, Department of Social Policy and Social Work.	“To reject PAS is ... to question the simplistic causal connection the theory <i>assumes</i> , recognising a more complex process in which many factors, often associated with the child’s stage of development, produce alienation in the child (Kelly and Johnston, 2001). The existence of an alienating parent is neither a necessary, nor a sufficient condition” (emphasis added) (p. 5).	Sturge 2000, Bruch 2001
15 Caplan 2004	Paula J. Caplan (2004). What is it that’s being called “parental alienation syndrome”? In P. J. Caplan & L. Cosgrove (Eds.), <i>Bias in Psychiatric Diagnosis</i> (pp. 61–67). Lanham, Maryland: Jason Aronson.	“A parent who refuses to force the children to visit their father (even when an abuse allegation is still being investigated) or does not ‘cooperate’ with a court-ordered assessment is <i>assumed</i> to be involved in PAS rather than possibly perceiving accurately or even reasonably believing that the father or assessor may be biased against her child” (emphasis added) (p. 63).	Faller 1998
16 Johnston 2004	Janet R. Johnston and Joan B. Kelly (2004). Commentary on Walker, Brantley, and Rigsbee’s (2004) “A critical analysis of parental alienation syndrome and its admissibility in the family court.” <i>Journal of Child Custody</i> , 1(4), 77–88.	“[Gardner’s] proposition as to the causes of PAS is rendered tautological by the following kind of circular reasoning: an alienated child (who is supposedly distinct from an abused child) has by definition a brainwashing parent; hence, if a child is alienated, then a brainwashing parent exists and is the sole cause” (p. 78).	Lee 2001, Sturge 2000

<p>17 Evans 2004</p>	<p>Marian Evans (2004). <i>An Examination of Some Relationships between the New Zealand Jurisprudence of Shared, Equal Parental Rights and Responsibilities and the Gendered Hierarchy of Care, 1994–2002</i> [Masters of Laws thesis]. University of Otago, Dunedin, New Zealand.</p>	<p>“Faller identifies, inter alia, a fundamental flaw in the syndrome as being that it fails to take into account alternative explanations for the mother’s or the child’s behaviour” (p. 61).</p>	<p>Faller 1998, Sturge 2000</p>
<p>18 Emery 2005</p>	<p>Robert E. Emery, Randy K. Otto, and William T. O’Donohue (2005). A critical assessment of child custody evaluations: Limited science and a flawed system. <i>Psychological Science in the Public Interest</i>, 6(1), 1-29.</p>	<p>“Gardner asserts that PAS ... is characterized by one parent ‘programming’ a child against the other parent (Gardner, 2001). The <i>assumption</i> is that a child’s disdain for one parent is generally unjustified and solely attributable to denigration on the part of the other, alienating parent” (emphasis added) (p. 10).</p>	<p>None</p>
<p>19 Johnston 2005</p>	<p>Janet R. Johnston (2005). Children of divorce who reject a parent and refuse visitation: Recent research and social policy implications for the alienated child. <i>Family Law Quarterly</i>, 38(4), 757–775.</p>	<p>“Gardner’s proposition as to the cause of PAS is rendered tautological by the following kind of circular reasoning: an alienated child (who is supposedly distinct from an abused child) has by definition a brainwashing parent; hence if a child is alienated, then a brainwashing parent exists and is the sole cause” (p. 760).</p>	<p>Faller 1998, Wood 1994, Sturge 2000, Lee 2001, Bruch 2001, Johnston 2004</p>
<p>20 Blank 2006</p>	<p>G. Kim Blank and Tara Ney (2006). The (de)construction of conflict in divorce litigation: A discursive critique of “parental alienation syndrome” and “the alienated child.” <i>Family Court Review</i>, 44(1), 135–148.</p>	<p>“The child’s story ... is <i>always</i>, according to Gardner, the product of brainwashing on the part of the parents. ... On one hand, there ‘are those who deny the possibility that any child could develop an irrational alienation from a parent,’ and on the other, those, like Gardner, who hold that a parent is always to blame” (emphasis in original) (pp. 141, 146).</p>	<p>Faller 1998, Bruch 2001, Wood 1994</p>

<p>21 Hoult 2006</p>	<p>Jennifer Hoult (2006). The evidentiary admissibility of parental alienation syndrome: Science, law, and policy. <i>Children's Legal Rights Journal</i>, 26(1), 1–61.</p>	<p>“By diagnosing PAS solely on the basis of the child’s symptoms, the DDC tautologically <i>presume</i> pathology, parental contribution, and lack of justification, the very factors that Gardner claimed distinguish PAS from other forms of [contact refusal]” (emphasis added) (p. 9).</p>	<p>Bruch 2001; Ducote 2002 Lee 2001; Wood 1994; Becker 2003; Meier 2003</p>
<p>22 NCJFCJ 2006</p>	<p>Clare Dalton, Leslie M. Drozd, and Frances Q. F. Wong (2006). <i>Navigating Custody & Visitation Evaluations in Cases with Domestic Violence: A Judge’s Guide</i>, revised. Reno, NV: National Council of Juvenile and Family Court Judges.</p>	<p>“The discredited ‘diagnosis’ of ‘PAS’ (or allegation of ‘parental alienation’) ... inappropriately asks the court to <i>assume</i> that the child’s behaviors and attitudes toward the parent who claims to be ‘alienated’ have no grounding in reality” (emphasis added) (p. 24)</p>	<p>Bruch 2001; Faller 1998; Meier 2003</p>
<p>23 Fuller 2007</p>	<p>Rana Fuller (2007). How to effectively advocate for battered women when systems fail. <i>William Mitchell Law Review</i>, 33(3), 939–969.</p>	<p>“The [NCJFCJ] Guide goes on to say that not only is PAS an invalid theory, its application in domestic violence cases is completely wrong. PAS asks the court to ignore the child’s concern for his or her own safety and instead to <i>assume</i> that the child is making it all up” (emphasis added) (p. 957).</p>	<p>Wood 1994, NCJFCJ 2006, Meier 2003</p>
<p>24 Robertson 2007</p>	<p>Neville Robertson, Ruth Busch, Radha D’Souza, Fiona Lam Sheung, Reynu Anand, Roma Balzer, Ariana Simpson, and Dulcie Paina (August 2007). <i>Living at the Cutting Edge: Women’s Experiences of Protection Orders. Volume 2: What’s to be Done? A Critical Analysis of Statutory and Practice Approaches to Domestic Violence</i>. University of Waikato (School of Law and the Māori and Psychology Research Unit).</p>	<p>“The discredited ‘diagnosis’ of ‘PAS’ (or allegation of ‘parental alienation’) ... inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the parent who claims to be ‘alienated’ have no grounding in reality” (emphasis added) (p. 109).</p>	<p>Sturge 2000, Meier 2003, Emery 2005, NCJFCJ 2006</p>

<p>25 Zorza 2007</p>	<p>Joan Zorza (2007). The “friendly parent” concept—Another gender biased legacy from Richard Gardner. <i>Domestic Violence Report</i>, 12(5), 65, 75–78.</p>	<p>“The child’s continued desire to return to the ‘alienating parent’ is seen as proof that the alienating behaviors are continuing” (p. 65).</p>	<p>NCJFCJ 2006</p>
<p>26 NCJFCJ 2008</p>	<p>Jerry J. Bowles, Kaye K. Christian, Margaret B. Drew, and Katheryn L. Yetter (2008). <i>A Judicial Guide to Child Safety in Custody Cases</i>. Reno, NV: National Council of Juvenile and Family Court Judges.</p>	<p>“The discredited ‘diagnosis’ of PAS (or an allegation of ‘parental alienation’) ... inappropriately asks the court to <i>assume</i> that the child’s behaviors and attitudes toward the parent who claims to be ‘alienated’ have no grounding in reality” (emphasis added) (p. 13).</p>	<p>NCJFCJ 2006</p>
<p>27 Brown 2008</p>	<p>Andraé L. Brown (2008). Criminal rewards: The impact of parent alienation syndrome on families. <i>Affilia: Journal of Women and Social Work</i>, 23(4), 388–396.</p>	<p>“Unfortunately, the intentionally vague and undefined diagnostic criteria for PAS shift the focus from the abusing parent to the child. A frame is set in which all negative statements made by children about the noncustodial parent become evidence of alienation by the custodial parent” (p. 388).</p>	<p>Bruch 2001, Dallam 1999, Faller 1998, Hoult 2006</p>
<p>28 Drozd 2009</p>	<p>Leslie M. Drozd (2009). Rejection in cases of abuse or alienation in divorcing families. In R. M. Galatzer-Levy, L. Kraus, & J. Galatzer-Levy (Eds.), <i>The Scientific Basis of Child Custody Decisions</i>, 2nd ed., pp. 403–416. Hoboken, NJ: John Wiley & Sons.</p>	<p>“Parental alienation syndrome refers to a purported pattern of signs and symptoms occurring in the child that indicate the presence of alienating behavior in a parent that has resulted in the child’s alienation from the other parent Gardner claimed that the presence of several elements of this supposed syndrome indicated that the child had been induced to hate the alienated parent by the activities of the supposed alienating parent ...” (pp. 404, 405).</p>	<p>None</p>
<p>29 Meier 2009a</p>	<p>Joan S. Meier (2009a). A historical perspective on parental alienation syndrome and parental alienation. <i>Journal of Child Custody</i>, 6(3/4), 232–257.</p>	<p>“It is this kind of circularity and conclusory reasoning that gives weight to the common accusation that PAS theory simply <i>presumes</i> that a child’s hostility toward a father is pathological and</p>	<p>Wood 1994, Faller 1998, Bruch 2001, Ducote 2002, Meier 2003, Johnston 2004,</p>

		that mothers who make such allegations are doing so only to undermine the child’s relationship with the father” (emphasis in original) (p. 236).	Johnston 2005, Emery 2005, Hoult 2006, NCJFCJ 2006
30 Meier 2009b	Joan S. Meier (2009b). Parental alienation syndrome and parental alienation. New York State Office for the Prevention of Domestic Violence, <i>OPDV Bulletin</i> , Summer 2009, 2.	“The [NCJFCJ] has warned that: ‘[t]he discredited “diagnosis” of “PAS” (or allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality.’” (emphasis added) (p. 2)	Emery 2005 NCJFCJ 2006
31 Neustein 2009	Amy Neustein and Michael Leshner (2009). Evaluating PAS: A critique of Elizabeth Ellis’s “A stepwise approach to evaluating children for PAS.” <i>Journal of Child Custody</i> , 6(3/4), 322–325.	“Yet the <i>assumption</i> of a reliable correlation between a child’s fear and dislike of his father and a ‘campaign of denigration’ by the child’s mother was the heart and soul of Gardner’s PAS theory” (emphasis added) (p. 323).	Faller 1998, Bruch 2001, Hoult 2006
32 APSAC 2010	Kathleen Coulborn Faller (2010). APSAC responds to inclusion of PAS/PAD information in <i>Diagnostic and Statistical Manual of Mental Disorders</i> . <i>APSAC Advisor</i> , Spring/Summer 2010, 20–22.	“A fundamental vulnerability of PAD is that it <i>assumes</i> that the professional evaluating the ‘alienated child’ is omniscient, that is, the professional knows all the sources of the child’s rejection of a parent. Most important from the perspective of APSAC, PAD <i>assumes</i> the professional knows with sufficient certainty that the child has NOT been maltreated or otherwise traumatized by the parent he or she is trying to avoid by refusing to visit” (emphases added) (p. 20).	Faller 1998, Bruch 2001
33 Meier 2010	Anne Whalen Gill, David B. Salmons, Erin S. Conroy, and Joan S. Meier (2010). Appellate brief. <i>AC v. AW</i> , Colorado Court of Appeals. 2011 Colo. App. Lexis 293; 2011 WL 883211.	“[S]ee also [NCJFCJ] (2006) (warning that ‘[t]he discredited “diagnosis” of “PAS” (or allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality and	NCJFCJ 2006, Emery 2005

		“diverts attention away from the behaviors of the abusive parent””)” (emphasis added) (p. 34).	
34 Erickson 2010	Nancy S. Erickson (2010). Fighting false allegations of parental alienation raised as defenses to valid claims of abuse. In: Mo Therese Hannah and Barry Goldstein (Eds.), <i>Domestic Violence, Abuse, and Child Custody: Legal Strategies and Policy Issues</i> (pp. 20-1 – 20-38). Kingston, NJ: Civic Research Institute.	“[The father] expects the court to make a leap of logic from the children’s feelings of antagonism toward him to a conclusion that the mother has <i>caused</i> the antagonism, which is then labeled ‘alienation’” (emphasis in original) (p. 20-7).	Johnston 2004, Wood 1994, Hoult 2006, Bruch 2001, Meier 2009a, Zorza 2010, Zorza 2007, NCJFCJ 2006
35 Zorza 2010	Joan Zorza (2010). Child custody practices of the family courts in cases involving domestic violence. In: Mo Therese Hannah and Barry Goldstein (Eds.), <i>Domestic Violence, Abuse, and Child Custody: Legal Strategies and Policy Issues</i> (pp. 1-1 – 1-32). Kingston, NJ: Civic Research Institute.	“PAS proponents seldom check if there is any basis for the abuse allegations, <i>presuming</i> them to be false and that the mother should lose custody. (emphasis added) (p. 1-24).	Meier 2003, Ducote 2002, Meier 2009a, Zorza 2007
36 Yeamans 2010	Robin Yeamans (2010). Urgent need for quality control in child custody psychological evaluations. In: Mo Therese Hannah and Barry Goldstein (Eds.), <i>Domestic Violence, Abuse, and Child Custody: Legal Strategies and Policy Issues</i> (pp. 21-1 – 21-21). Kingston, NJ: Civic Research Institute.	“When a child would say that a parent (usually, but not always, the father) was hurting him/her, this was taken as proof that the other parent (usually the mother) was brainwashing the child. So that the more the child complained, the more the court came to the rescue of the ‘targeted’ parent” (pp. 21-10 – 21-11).	Dallam 1999, Emery 2005
37 Sottomayor 2011	Maria Clara Sottomayor (2011). Uma análise crítica da síndrome de alienação parental e os riscos da sua utilização nos tribunais de família (A critical analysis of parental alienation syndrome and the risks of its use in family courts) (Portuguese). <i>Julgar</i> , No. 13, 73–107.	“The fact that a child radically rejects one parent does not prove that the other has brainwashed the child, as the PAS thesis <i>presumes</i> ” (translated from Portuguese) (emphasis added) (p. 81).	Bruch 2001, Hoult 2006, NCJFCJ 2008, Dallam 1999

<p>38 Goldstein 2011</p>	<p>Barry Goldstein (2011). Extreme custody decisions that risk lives. <i>Family & Intimate Partner Violence Quarterly</i>, 4(2), 165–184.</p>	<p>“One common example of a non-safety issue is the use of alienation to justify the extreme decisions. One of the problems with alienation is that courts often allow fathers to make a general complaint claiming alienation without specifying exactly what the mother is allege do have done.”</p>	<p>None</p>
<p>39 Goldstein 2012</p>	<p>Barry Goldstein (2012). How do we know custody courts are sending children to live with abusers? National Organization for Men against Sexism. https://nomas.org/how-do-we-know-custody-courts-are-sending-children-to-live-with-abusers/</p>	<p>“PAS <i>assumes</i> that if a child expresses negative feelings about the father or doesn’t want visitation, the only possible explanation is that the mother alienated the child and the solution is to force the child to live with the abuser” (emphasis added) (p. 5).</p>	<p>None</p>
<p>40 Pence 2012</p>	<p>Ellen Pence, Gabrielle Davis, Cheryl Beardslee, Denise Gamache (June 2012). <i>Mind the Gap: Accounting for Domestic Abuse in Child Custody Evaluations</i>. Minneapolis, MN: The Battered Women’s Justice Project.</p>	<p>“We saw numerous examples of documented abuse toward a parent or child ... explained away altogether under the framework of parental alienation. Some evaluators seemed quick to <i>assume</i> that a child’s attachments and/or aversions towards one parent were the product of manipulation, suggestion, or contempt by the other parent” (emphasis added) (p. 15).</p>	<p>None</p>
<p>41 Goldstein 2013</p>	<p>Barry Goldstein, Elizabeth Liu (2013). <i>Representing the Domestic Violence Survivor: Critical Legal Issues, Effective Safety Strategies</i>. Kingston, NJ: Civic Research Institute.</p>	<p>“PAS is based on circular reasoning because the <i>assumption</i> is that if the children do not wish to visit the father, dislike him, or fear him, the only possible cause for this are behaviors by the mother than undermine the relationship with the father” (emphasis added) (p. 7-23).</p>	<p>Yeamans 2010</p>
<p>42 Meier 2013</p>	<p>Joan S. Meier (2013). <i>Parental Alienation Syndrome and Parental Alienation: A Research Review</i>. Harrisburg, PA: VAWnet, a project of the National Resource Center on Domestic Violence.</p>	<p>“In short, Gardner’s PAS theory essentially <i>presumes</i> PAS’s existence from the mere presence of a child’s hostility toward and/or fear of their father based on alleged abuse. This is unfortunately</p>	<p>Bruch 2001, NCJFCJ 2006, Hoult 2006, Johnston 2004, Wood 1994, Emery 2005, Faller 1998, Johnston 2005, Silberg 2013</p>

		precisely how it has been applied in many courts” (emphasis added) (p. 2).	
43 Silberg 2013	Joyanna Silberg, Stephanie Dallam, Elizabeth Samson (2013). Crisis in family court: Lessons from turned around cases. Final report submitted to the Office of Violence Against Women, U.S. Department of Justice.	“Under PAS doctrine, ... [i]t is reasoned that when one determines that a child is alienated, the preferred parent <i>must</i> be engaged in brainwashing the child against the rejected parent” (emphasis in original). ... Thus if a child rejects their father or accuses him of abuse, the child is considered to be a liar and the mother is <i>assumed</i> to have brainwashed the child into believing they were abused” (emphasis added) (pp. 16–17).	Bruch 2001, Lee 2001, Wood 1994, NCJFCJ 2006, Meier 2003, Faller 1998, Ducote 2002, Meier 2009a, Emery 2005, Meier, 2013, Hoult 2006, Rotgers 1996
44 Erickson 2013	Nancy S. Erickson (Summer 2013). Fighting false allegations of parental alienation raised as defenses to valid claims of abuse. <i>Family & Intimate Partner Violence Quarterly</i> , 6(1), 35–78.	“[The father] may state the children are reluctant to visit with him, tell him they do not want to see him, or otherwise express fear or dislike of him. ... [H]e expects the court to make a leap of logic from the children’s feelings of antagonism toward him to a conclusion that the mother has <i>caused</i> the antagonism, which is then labeled ‘alienation”” (emphasis in original) (p. 41).	Wood 1994, Erickson 2010, Bruch 2001, Zorza 2010, Meier 2009a, Yeamans 2010, Johnston 2004, Zorza 2007, Hoult 2006, NCJFCJ 2006
45 Yanchar 2014	Georgia E. Yanchar et al. (2014). Memorandum in support of jurisdiction of <i>amici curiae</i> , Action Ohio Coalition for Battered Women, Ohio NOW Education and Legal Fund, Professor Mike Brigner, J.D., and Domestic Violence Legal Empowerment and Appeals Project in support of Appellant. In the Supreme Court of Ohio, Court of Appeals Case No. CA-12-098708. Filed January 13, 2014.	“[PAS] theory <i>presumed</i> that children’s reports of child abuse are illegitimate and due solely to the mother’s pernicious influence and desire to exclude the father from the children’s life” (emphasis added) (p. 6).	Hoult 2006, NCJFCJ 2006, Johnston 2004, Emery 2005, Bruch 2001, Johnston 2005, Meier 2009a
46 Behre 2015	Kelly Alison Behre (May 2015). Digging beneath the equality language: The influence of the fathers’ rights movement on intimate partner violence public policy debates and	“[Fathers’ rights groups] attempt to reframe the issue of IPV [intimate partner violence] by creating a <i>presumption</i> that mothers alleging IPV are lying and that their false allegations are evidence of PAS,	Meier 2009a, Erickson 2013

	family law reform. <i>William & Mary Journal of Race, Gender, and Social Justice</i> , 21(3), 525–602.	an act of child abuse that should result in a change in custody in favor of the father” (emphasis added) (p. 539).	
47 Clemente 2015	Miguel Clemente and Dolores Padilla-Racero (2015). Are children susceptible to manipulation? The best interest of children and their testimony. <i>Children and Youth Services Review</i> , 51, 101–107.	“The term ‘campaign of denigration’ (Gardner, 1998, 1999), <i>assumes</i> that the child is lying. ... Thus, if a child states that she does not want to see her father, this is explained as fruit of the mother’s manipulation, and the mother would be accused of being a manipulative mother” (emphasis added) (p. 102).	None
48 Huff 2015	Scott C. Huff (2015). <i>Expanding the Relationship between Parental Alienating Behaviors and Children’s Contact Refusal Following Divorce: Testing Additional Factors and Long-Term Outcomes</i> [Doctoral dissertation]. University of Connecticut.	“Gardner (1999, 2004), for example, uses child behaviors of contact refusal to diagnose the presence of severe alienating behavior by the parent” (p. 72).	Meier 2009a
49 Thomas 2015	Rebecca M. Thomas and James T. Richardson (2015). Parental alienation syndrome: 30 years on and still junk science. <i>Judges’ Journal</i> , 54(3), 22, 24.	“[The NCJFCJ advises judges,] ‘the court should not accept testimony regarding parental alienation syndrome’ ... and ‘the discredited “diagnosis” of “PAS” (or allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality”’ (emphasis added) (p. 22).	NCJFCJ 2008
50 Brigner 2016	Mike Brigner, Barry Goldstein (2016). Improving judges’ responses to domestic violence custody cases. In: Mo Therese Hannah and Barry Goldstein (Eds.), <i>Domestic Violence, Abuse, and Child Custody: Legal Strategies and Policy Issues</i> , Volume 2 (pp. 6-1 – 6-31). Kingston, NJ: Civic Research Institute.	“The DOJ study is just the latest to undermine the basis for PAS, which is based on circular reasoning—that if a child dislikes or does not want to visit the father, it must be because the mother alienated the child from the father” (p. 6-22).	Dallam 1999, NCJFCJ 2008

51 O'Donohue 2016	William O'Donohue, Lorraine T. Benuto, and Natalie Bennett (2016). Examining the validity of parental alienation syndrome. <i>Journal of Child Custody</i> , 13(2/3), 113–125.	"[Gardner] also claimed that the reverse <i>inference</i> was valid; specifically, that clinicians could conclude that there is an alienating parent when they observed children exhibiting certain behaviors" (emphasis added) (p. 114).	Caplan 2004, Emery 2005
52 Clemente 2016	Miguel Clemente and Dolores Padilla-Racero (2016). When courts accept what science rejects: Custody issues concerning the alleged "parental alienation syndrome" <i>Journal of Child Custody</i> , 13(2/3), 126–133.	"The differential diagnosis of PAS is constructed <i>ad hoc</i> to attribute a pathogenic condition to the mother's (usually) manipulation, and to interpret any act or omission of the child in consistency with this harmful influence of the mother on him" (p. 128).	Bruch 2001, Clemente 2015, Meier 2009a
53 Dallam 2016	Stephanie Dallam and Joyanna Silberg (2016). Recommended treatments for "parental alienation syndrome" (PAS) may cause children foreseeable and lasting psychological harm. <i>Journal of Child Custody</i> , 13(2/3), 134–143.	"Gardner's theory of parental alienation was based on the <i>assumption</i> that if a child rejects their parent (usually the father) after allegations of abuse, the other parent (i.e., the mother) must have brainwashed the child" (emphasis added) (p. 135).	Rotgers 1996, Faller. 1998, Bruch 2001, Johnston 2004, NCJFCJ 2006, Meier 2013, Silberg 2013, Huff 2015, Thomas 2015, Clemente 2016, O'Donohue 2016
54 Saunders 2016a	Daniel G. Saunders and Katherine H. Oglesby (2016). No way to turn: Traps encountered by many battered women with negative child custody experiences. <i>Journal of Child Custody</i> , 13(2/3), 154–177.	"Evaluators in these reports frequently <i>assumed</i> that children's aversions to the abusive father resulted from their mother's negativity toward their father, the children being in a position of needing to protect their mother, or the children being forced to choose sides" (emphases added) (p. 167).	Bruch 2001, NCJFCJ 2006, Meier 2003, Meier 2009a, Meier 2013, Pence 2012
55 Saunders 2016b	Daniel G. Saunders and Kathleen Coulborn Faller (2016). The need to carefully screen for family violence when parental alienation is claimed. <i>Michigan Family Law Journal</i> , 46(6), 7–11.	"When a child does not want to visit or live with a parent after divorce or separation, the public and professionals may <i>assume</i> that the other parent has turned the child against the unwanted parent. This behavior is referred to as parental alienation behavior and the outcome as parental alienation" (emphasis added) (p. 7).	Johnston 2005, NCJFCJ 2006

56 Milchman 2017	Madelyn Simring Milchman (2017). Misogyny in New York custody decisions with parental alienation and child sexual abuse allegations. <i>Journal of Child Custody</i> , 14(4), 234–259.	“In the other 12 father custody cases with unfounded CSA allegations, there was no affirmative evidence of PA. The only PA evidence was the unfounded CSA allegations, which were interpreted as deliberate and malicious. ... The equation of an unfounded CSA allegation with PA in the absence of direct evidence for PA is a dangerous equation ...” (p. 237).	None
57 EAP 2018	European Association for Psychotherapy (2018). A statement from the European Association for Psychotherapy (EAP) on the concepts of “Parental Alienation Syndrome” (PAS) and “Parental Alienation” (PA). https://www.europsyche.org/quality-standards/eap-guidelines/parent-alienation-syndrome-pas-parental-alienation-pa/	“In cases of allegations of child abuse in a divorce or custody situation, one of the basic assumptions of PAS/PA is that the allegations made by the child or parent are untrue.”	None
58 Zaccour 2018	Suzanne Zaccour (2018). Parental alienation in Quebec custody litigation. <i>Les Cahiers de Droit</i> , 59(4), 1073–1111.	“Both leading models of PA(S) rely on the child: Gardner diagnoses PAS based on eight symptoms found in the child and <i>assumes</i> the alienating parent’s responsibility ...” (emphasis added) (p. 1097).	Bruch 2001, Meier 2009a, Johnston 2004, Thomas 2015, Johnston 2005
59 Neilson 2018	Linda C. Neilson (2018). <i>Parental Alienation Empirical Analysis: Child Best Interests or Parental Rights?</i> Fredericton, Canada: Muriel McQueen Fergusson Centre for Family Violence Research.	“Parental alienation advocates advise courts to <i>assume</i> the presence of parental alienation when children resist contact with non-primary-care parents” (emphasis added) (p. 29).	Drozd 2009, Bruch 2001, NCJFCJ 2006, NCJFCJ 2008, Meier 2009a, Meier 2009b, Dallam 1999, Thomas 2015, Huff 2015, Erickson 2013, Saunders 2016b, Hoult 2006
60 Willis 2018	Brendan Willis and William O’Donohue (2018). Parental alienation syndrome: A	“If a child states that he or she has been abused, then this is taken to be evidence of the syndrome. ... Similarly, parental alienation syndrome can turn	Bruch 2001, NCJFCJ 2006, Emery 2005, Meier 2013,

	critique. <i>Revista de Estudios e Investigación en Psicología y Educación</i> , 5(2), 74–81.	any accusation of abuse against a father into an alienation case where the mother is fabricating the entire story” (p. 78).	O’Donohue 2016, Johnston 2004
61 Teoh 2018	Jennifer Teoh, Grace S. Cnng, and Chi Meng Chu (2018). Parental alienation syndrome: Is it valid? <i>Singapore Academy of Law Journal</i> , 30, 727–755.	“ <i>Assumptions</i> were also made by Gardner regarding the pathology of the child’s hostility toward the alienated parent, and the aim of the alienating parent as always seeking to undermine the relationship between the child and the alienated parent. ... <i>Presuming</i> causal agents in the theory leaves no room for testing of multiple hypotheses so as to accurately ascertain cause and effect” (emphases added) (p. 738).	Faller 1998, Sturge 2000, Bruch 2001, Johnston 2004, Emery 2005, Hoult 2006, NCJFCJ 2006, Meier 2009a, APSAC 2010, Silberg 2013, Huff 2015, O’Donohue 2016, Dallam 2016
62 Benjamin 2018	G. Andrew H. Benjamin, Connie J. Beck, Morgan Shaw, and Robert Geffner (2018). <i>Family Evaluation in Custody Litigation</i> . Washington, DC: American Psychological Association.	“PAS <i>assumes</i> that children who show a dislike for one parent or demonstrate an unwillingness to live with him or her are frequently the victims of ‘programming’ (i.e., alienation) by the other parent. ... It further <i>assumes</i> that a child’s strong alignment with one parent while rejecting a relationship with the other parent is without legitimate justification” (emphasis added) (p. 34).	Meier 2009a, Hoult 2006, Emery 2005, Pence 2012, Saunders 2016a
63 Epstein 2019	Deborah Epstein, Lisa A. Goodman (2019). Discounting women: Doubting domestic violence survivors’ credibility and dismissing their experiences. <i>University of Pennsylvania Law Review</i> , 167(2), 399–461.	“Judges tend to conclude, typically with no evidence other than the perpetrator-father’s uncorroborated assertion, that women are fabricating abuse allegations as part of a strategic effort to alienate the children from their father” (p. 431).	Meier 2009a
64 Mercer 2019a	Jean Mercer (2019). Are intensive parental alienation treatments effective and safe for children and adolescents? <i>Journal of Child Custody</i> , 16(1), 67–113.	“PA proponents have ... <i>assumed</i> that [visitation resistance or refusal] ... is in itself evidence that the preferred parent has carried out a campaign of denigration against the nonpreferred parent” (emphasis added) (p. 95).	Clemente 2016, Dallam 2016, Hoult 2006, Huff 2015, Milchman 2017, Neilson 2018, Neustein 2009,

			O'Donohue 2016, Saunders 2016a, Silberg 2013
65 Mercer 2019b	Jean Mercer (2019). Examining parental alienation treatments: Problems of principles and practice. <i>Child and Adolescent Social Work Journal</i> , 36(4), 351–363.	“It is notable that ... a campaign of denigration [by the preferred parent] is usually <i>assumed</i> rather than demonstrated. ... It is an error of logic to <i>assume</i> that when a child avoids a non-preferred parent, the preferred parent must have persuaded the child to do so” (emphases added) (pp. 353, 358).	Dallam 2016, Mercer 2019a, Saunders 2016a
66 Joyce 2019	Kimberley J. Joyce (2019). Under the microscope: The admissibility of parental alienation syndrome. <i>Journal of the American Academy of Matrimonial Lawyers</i> , 32(1), 53–87.	“[PAS] is a disorder that excludes other factors that might impact the parent–child relationship, and attributes responsibility exclusively to the favored parent. <i>This</i> is the underlying structure of the theory: a <i>backwards-looking</i> theory of cause and effect (i.e., when you see the effect, you can look backwards and infer the cause)” (emphases in original) (pp. 65–66).	Dallam 2016, Mercer 2019a, Faller 1998, Bruch 2001, Neilson 2019
67 Šimonovic 2019	Dubravka Šimonovic, Hilary Gbedemah, Ivana Radačić, Feride Acar, Margarette May Macaulay, Lucy Asuagbor, Sylvia Mesa (May 31, 2019). Intimate partner violence against women is an essential factor in the determination of child custody, say women’s rights experts. (Representing the United Nations and other international organizations.)	“Parental alienation, while lacking a universal clinical or scientific definition, generally refers to the <i>presumption</i> that a child’s fear or rejection of one parent (typically the noncustodial parent), stems from the malevolent influence of the preferred (typically custodial) parent” (emphasis added) (Footnote 4).	None
68 Mercier 2019	Judith M. Mercier, Kristin Royal, Daniel Kavanaugh (2019). Brief of Amici Curiae, the Leadership Council for Child Abuse and Interpersonal Violence and Child USA in support of Appellant-Respondent. <i>Chelsea Nelson V. Ian G. Clark</i> . Filed June 11, 2019.	“A leading association of juvenile & family court judges published the following guideline for custody courts: ‘The discredited “diagnosis” of “PAS” (or allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the	Clemente 2016, NCJFCJ 2006, Johnston 2005, Meier 2013, Milchman 2017, Silberg 2013, Thomas 2015, Zaccour 2018

		parent who claims to be “alienated” have no grounding in reality” (emphasis added) (pp. 8–9).	
69 Neilson 2019	Linda C. Neilson, Joan Meier, Elizabeth Sheehy, Margaret Jackson, Ruth Halperin-Kaddari, Susan Boyd, Peter Jaffe, and Simon Lapierre (2019). <i>Collective Memo of Concern to: World Health Organization</i> . https://www.learningtoendabuse.ca/docs/WHO-September-24-2019.pdf	“Empirically verified problems associated with the application of parental alienation theory ... include: ... Deflection of attention from scrutiny of parenting practices and parent–child relationships in favor of <i>assuming</i> primary-care parent blame when children have poor relationships with the other parent” (emphasis added) (p. 1).	Drozd 2009, NCJFCJ 2006, Bruch 2001, NCJFCJ 2008, Meier 2009a, Neilson 2018, Dallam 1999, Meier 2009b, Thomas 2015, Mercer 2019a, Huff 2015, Milchman 2017, Erickson 2013, Saunders 2016b, Silberg 2013, Zaccour 2018, Dallam 2016, Clemente 2016, Meier 2019b, Meier 2019a
70 Meier 2019a	Joan S. Meier, Sean Dickson, Chris O’Sullivan, Leora Rosen, and Jeffrey Hayes (2019). Child custody outcomes in cases involving parental alienation and abuse allegations. George Washington University Law School Public Law Research Paper No. 2019–56.	“Parental alienation ... is the theory that when a mother and/or child seek to restrict a father’s access to the child, their claims of dangerousness or harm are not true, but due to the mother’s anger or hostility, or pathology” (p. 4).	Silberg 2013, Faller 1998
71 Meier 2019b	Joan S. Meier and Sasha Drobnick (2019). Brief of Domestic Violence Legal Empowerment and Appeals Project et al. as <i>Amici Curiae</i> in support of Plaintiff-Appellant, <i>Anonymous v. Anonymous and Anonymous</i> (N.Y. Court of Appeals 2019).	“Parental alienation ... generally refers to the <i>presumption</i> that a child’s fear or rejection of one parent ... stems from the malevolent influence of the preferred ... parent. ... The [NAJFCJ] warns custody courts: ‘The discredited “diagnosis” of PAS (or an allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the child’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality” (emphases added) (pp. 2, 7).	Bruch 2001, Clemente 2016, NCJFCJ 2006, Emery 2005, Epstein 2019, Johnston 2005, Meier 2013, Mercer 2019a, Milchman 2017, Silberg 2013, Thomas 2015, Zaccour 2018

<p>72 Silberg 2019</p>	<p>Joyanna Silberg and Stephanie Dallam (2019). Abusers gaining custody in family courts: A case series of over turned decisions. <i>Journal of Child Custody</i>, 16(2), 140–169.</p>	<p>“[T]he various parental alienation theories utilized by professionals evaluating the children in our dataset all included the logical error of affirming the consequent . . . , as there had been no documentation of the mothers attempting to brainwash their children against their father” (p. 160).</p>	<p>Bruch 2001, Clemente 2016, Dallam 2016, Ducote 2002, Emery 2005, Faller 1998, Hoult 2006, Huff 2015, Meier 2013, Mercer 2019a, O’Donohue 2016</p>
<p>73 APSAC 2019</p>	<p>American Professional Society on the Abuse of Children (2019). <i>APSAC Practice Guidelines for the Investigation and Determination of Suspected Psychological Maltreatment of Children and Adolescents</i>. New York, NY: American Professional Society on the Abuse of Children.</p>	<p>APSAC strongly criticized a diagnosis of parental alienation: “To find that a parent has committed psychological abuse of a child in an effort to interfere with that child’s relationship with the other parent requires direct evidence of the parent’s behavior such as significant denigration, efforts to undermine the relationship of that child with the other parent, and/or efforts to get the child to make false allegations of abuse or other extremely damaging behavior by the other parent. A child’s avoidance of a parent is not sufficient evidence of psychological abuse by either parent” (p. 1).</p>	<p>None</p>
<p>74 Robb 2019</p>	<p>Kathryn Robb and Danielle Pollack (December 4, 2019). HB1397. Philadelphia, PA: CHILD USAAdvocacy.</p>	<p>“The [NCJFCJ] likewise finds PAS lacking in scientific merit . . . and ‘the discredited “diagnosis” of “PAS” (or allegation of “parental alienation”) . . . inappropriately asks the court to <i>assume</i> that the children’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality”’ (emphasis added).</p>	<p>NCJFCJ 2008, Thomas 2015</p>
<p>75 Meier 2020</p>	<p>Joan S. Meier (2020). U.S. child custody outcomes in cases involving parental alienation and abuse allegations: What do the data show? <i>Journal of Social Welfare and Family Law</i>, 42(1), 92–105.</p>	<p>“Parental alienation, while lacking any universal definition, embodies the notion that when a child (or the primary parent) resists contact with the non-custodial parent without ‘legitimate’ reason, the preferred parent is ‘alienating’ the child, due to her own anger, hostility or pathology” (p. 93).</p>	<p>Bruch 2001, Faller 1998, Johnston 2005, Meier 2003, Meier 2009a, Neilson 2018, Silberg 2013, Thomas 2015, Zaccour 2018</p>

<p>76 Workgroup 2020</p>	<p>Workgroup to Study Child Custody Court Proceedings Involving Child Abuse or Domestic Violence Allegations (2020). <i>Final Report</i>. Annapolis, MD: Department of Legislative Services.</p>	<p>“Professor Meier asserts that, in practice, there is no real difference between the terms PAS and parental alienation. In fact, NCJFCJ uses the terms interchangeably when it notes that: ‘... The discredited “diagnosis” of PAS (or an allegation of “parental alienation”) ... inappropriately asks the court to <i>assume</i> that the child’s behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality” (emphasis added) (p. 9).</p>	<p>Meier 2019a, Meier 2019b, NCJFCJ 2008</p>
<p>77 Geffner 2020</p>	<p>Robert Geffner and Aileen Herlinda Sandoval (2020). Parental alienation syndrome/parental alienation disorder (PAS/PAD): A critique of a “disorder” frequently used to discount allegations of interpersonal violence and abuse in child custody cases. <i>APSAC Advisor</i>, 32(1), 28–34.</p>	<p>“The concept of PA, when accurately used, <i>assumes</i> a parent is intentionally attempting to turn a child against the other parent through concerted efforts of verbally denigrating the other parent or acting in other ways to accomplish this goal” (emphasis added) (p. 28).</p>	<p>NCJFCJ 2008, Bruch 2001, Neilson 2019, Dallam 2016, NCJFCJ 2006, Faller 1998, Meier 2009b, Mercer 2019a, O’Donohue 2016</p>
<p>78 Sandoval 2020</p>	<p>Aileen Herlinda Sandoval and Robert Geffner (2020). Can there be a bridge between interpersonal violence/abuse and parental alienation proponents: A response to Milchman. <i>APSAC Advisor</i>, 32(1), 38–42.</p>	<p>“Different constructs and labels have been used to discuss a child rejecting contact with a parent, and PAS/PAS/PA proponents <i>assume</i> that there is no justification for this refusal and negative reaction by the child so therefore it must be due to alienation” (emphasis added) (p. 38).</p>	<p>Benjamin 2018, Geffner 2020, Lee 2001, O’Donohue 2016, Silberg 2019</p>
<p>79 Johnston 2020</p>	<p>Janet R. Johnston and Matthew J. Sullivan (2020). Parental alienation: In search of common ground for a more differentiated theory. <i>Family Court Review</i>, 58(2), 270–292.</p>	<p>Johnston and Sullivan listed “Common Erroneous Assumptions Deriving from the Single Factor Model.” One of the erroneous assumptions in their list was: “If a parentally alienated child exists, then the preferred parent’s alienating behavior must exist and is fueling the child’s alienation” (emphasis added) (p. 278).</p>	<p>Bruch 2001, Clemente 2016, Dallam 2016, Johnston 2005, Lee 2001, Meier 2009a, Meier 2019b, Mercer 2019a, Milchman 2020, O’Donohue 2016, Thomas 2015, Neilson 2019</p>

<p>80 Sullivan 2020</p>	<p>Matt Sullivan (May 2020). Parental alienation: In search of common ground for a more differentiated theory. AFCC Special Webinar Series on Parent–Child Contact Problems.</p>	<p>“Common Erroneous <i>Assumptions</i> Deriving from the False Dichotomy are made by PA proponents. Myth 2. If a parentally alienated child exists, then the preferred parent’s PAB must exist and is fueling the child’s alienation” (emphasis added) (Slide 16).</p>	<p>Johnston 2020</p>
<p>81 Milchman 2020</p>	<p>Madelyn S. Milchman, Robert Geffner, and Joan S. Meier (2020). Ideology and rhetoric replace science and reason in some parental alienation literature and advocacy: A critique. <i>Family Court Review</i>, 58(2), 340–361.</p>	<p>“[E]rrors also are frequently made by those who are predisposed to <i>assume</i> that improper PAS/PAD/PA by the child’s preferred parent is the explanation for a child’s rejection or resistance to the other parent” (emphasis added) (pp. 341–342).</p>	<p>Benjamin 2018, Bruch 2001, Dallam 1999, NCJFCJ 2006, Drozd 2009, Faller 1998, APSAC 2010, Geffner 2020, Johnston 2020, Lee 2001, Meier 2009a, Meier 2013, Meier 2019a, Milchman 2017, O’Donohue 2016, Silberg 2019</p>
<p>82 Faller 2020</p>	<p>Kathleen Coulborn Faller (2020). APSAC position on parental alienation. APSAC Virtual Colloquium, September 22, 2020.</p>	<p>Faller strongly criticized a diagnosis of parental alienation: “To find that a parent has committed psychological abuse of a child in an effort to interfere with that child’s relationship with the other parent requires direct evidence of the parent’s behavior such as significant denigration, efforts to undermine the relationship of that child with the other parent, efforts to get the child to make false allegations of abuse or other extremely damaging behavior by the other parent . . . A child’s avoidance of a parent is not sufficient evidence of psychological abuse by the other parent” (slides 5, 6).</p>	<p>APSAC 2019</p>
<p>83 Mercer 2020</p>	<p>Jean Mercer (2020). Parental alienation and harms to children. APSAC Virtual Colloquium, September 22, 2020.</p>	<p>“[Parental Alienation Belief System] supporters assert that child avoidant behavior is evidence that psychological harm has occurred Examining</p>	<p>Silberg 2019</p>

		the Claim that Child Avoidant Behavior is Evidence of Previous and Ongoing Psychological Harm. N.B. this is the most important of all PABS claims The preferred parent is thus categorized as an abuser, even if that person’s actions are only <i>inferred</i> from child avoidant behavior” (emphasis added) (slides 3, 4, 6).	
84 Marques 2020	Thelma Moreira Marques, Isabel Narciso, and Luana Cunha Ferreira (2020). Empirical research on parental alienation: A descriptive literature review. <i>Children and Youth Services Review</i> , 119, 105572.	“As Mercer ... recently pointed out, there is an error of logic in the <i>assumption</i> that the child’s resistance or contact refusal is always the result of the manipulation or persuasion of the preferred parent, who influences the child to avoid the nonpreferred parent” (emphasis added) (p. 8).	Clemente 2016, Johnston 2020, Meier 2009a, Mercer 2019b, Milchman 2020, Neilson 2018
85 Barnett 2020	Adrienne Barnett (2020). <i>Domestic Abuse Bill 2020: Submissions on Parental Alienation</i> . Document submitted to British Parliament, September 2020.	“Gardner diagnosed PAS from the collective presence of all or most of eight behaviours (signs) in the child and maintained that the defining feature of PAS was the active participation by the child (Zaccour, 2018). Subsequently, PAS was extended to include cases of all types in which a child refused to visit the noncustodial parent (Bruch, 2001)” (section 2).	Bruch 2001, Dallam 2016, Erickson 2013, Mercer 2019a, Meier 2009a, Meier 2013, Meier 2020, Milchman 2017, NCJFCJ 2008, Neilson 2018, Silberg 2013, Sturge 2000, Thomas 2015, Zaccour 2018
86 Mercer 2021	Jean Mercer (2021). Rejecting the idea of rejection as a measure of parental alienation: Comment on Bernet, Gregory, Rohner, and Reay (2020). <i>Journal of Family Trauma, Child Custody, & Child Development</i> , 18(3), 201–209.	“The ideas behind PA are implausible for a variety of reasons, but an essential issue has to do with the use of <i>inference</i> rather than direct observation (Milchman et al., 2020). A child’s rejection of one parent is <i>inferred</i> to mean that the preferred parent has acted to alienate the child, and this <i>assumption</i> is made without evidence that such actions occurred except possibly for statements offered by the rejected parent” (emphases added) (p. 203).	Mercer 2019a, Milchman 2020

<p>87 Meier 2021</p>	<p>Joan S. Meier (2021). Denial of family violence in court: An empirical analysis and path forward for family law. <i>George Washington Law Faculty Publications & Other Works</i>. 1536.</p>	<p>“Parental alienation lacks a singular definition but is generally understood as toxic behavior by a parent to undermine the children’s relationship with the other parent. It is typically invoked whenever children resist contact with a (usually noncustodial) parent” (p. 1, FN 4).</p>	<p>Faller 1998, Silberg 2019, Bruch 2001, Ducote 2002, Meier 2019a, Meier 2020, Meier 2003, Meier 2010, Meier 2009a, Meier 2013, Johnston 2020, Johnston 2005, Johnston 2004, Hoult 2006, Silberg 2013, Milchman 2017, Mercer 2019a</p>
<p>88 Corwin 2021</p>	<p>David L. Corwin (2021). Parental alienation: A simple but potentially harmful and poorly supported explanation for the complex problem of parental contact resistance/refusal (Clinical Perspective). Annual Meeting of American Academy of Child and Adolescent Psychiatry, Virtual, October 18–30, 2021.</p>	<p>Corwin strongly criticized a diagnosis of parental alienation: “To find that a parent has committed psychological abuse of a child in an effort to interfere with that child’s relationship with the other parent requires direct evidence of the parent’s behavior such as significant denigration, efforts to undermine the relationship of that child with the other parent, and/or efforts to get the child to make false allegations of abuse or other extremely damaging behavior by the other parent. A child’s avoidance of a parent is not sufficient evidence of psychological abuse by either parent.”</p>	<p>APSAC 2019</p>
<p>89 Mercer 2022</p>	<p>Jean Mercer and Margaret Drew (2022). Introduction to parental alienation concepts and practices. In Mercer, J., and Drew, M., (Eds.), <i>Challenging Parental Alienation: New Directions for Professionals and Parents</i>, pp. 1–17. London, United Kingdom: Routledge, Taylor and Francis Group.</p>	<p>“The ambiguity of the language makes it too easy to <i>imply</i> that when one of these phenomena is referenced, one or more of the others must be present. This is especially a problem when a child is said to show avoidance of one parent, and this statement is also taken to suggest, without further evidence, that a parent’s encouragement of the child’s avoidance is present Parental alienation proponents ... tend to <i>infer</i> the existence of parent encouragement when they observe child avoidance” (emphases added) (pp. 2, 4).</p>	<p>Mercer 2019a, Mercer 2019b</p>

90 Doughty 2022	Julie Doughty and Margaret Drew (2022). History of the parental alienation belief system. In Mercer, J., and Drew, M., (Eds.), <i>Challenging Parental Alienation: New Directions for Professionals and Parents</i> , pp. 21–39. London, United Kingdom: Routledge, Taylor and Francis Group.	“[Gardner] was unable to accept a straightforward explanation that a child resisting contact with a parent might be doing so because of something that parent had done. Instead, his only conclusion could be that the child was suffering a mental disorder, induced by the other parent” (p. 27).	Bruch 2001, Clemente 2016, Faller 1998, Hoult 2006, Meier 2009a, Meier 2019a, Mercer 2019a, Neilson 2018, Neilson 2019, Sandoval 2020
91 Drew 2022	Margaret Drew (2022). Gender credibility and culture: The impact on women accused of alienation. In Mercer, J., and Drew, M., (Eds.), <i>Challenging Parental Alienation: New Directions for Professionals and Parents</i> , pp. 159–172. London, United Kingdom: Routledge, Taylor and Francis Group.	“As alienation advocates argue, a child’s unwillingness to be with a parent creates a <i>presumption</i> that the (typically) mother’s actions cause the child’s choice. This <i>presumption</i> of maternal interference is a result of a cultural refusal to respect women, to hear their voices, and to credit their decisions” (emphases added) (p. 159).	Epstein 2019, Meier 2020
92 Meier 2022	Joan Meier (2022). Questioning the scientific validity of parental alienation labels in abuse cases. In Mercer, J., and Drew, M., (Eds.), <i>Challenging Parental Alienation: New Directions for Professionals and Parents</i> , pp. 216–235. London, United Kingdom: Routledge, Taylor and Francis Group.	“Alienation—as a label—facilitates the automatic attribution of a child’s avoidance or a parent’s concerns about the other’s parenting to an illegitimate ‘alienating’ motive without meaningful investigation (Milchman, Geffner, and Meier 2020)” (p. 223).	Dallam 2016, Emery 2005, Faller 1998, Johnston 2005, Johnston 2020, Meier 2013, Meier 2020, Mercer 2019a, Milchman 2020, Silberg 2019
93 Myers 2022	John E. B. Myers, Jean Mercer (2022). Parental alienation in family court: Attacking expert testimony. <i>Child and Family Law Journal</i> 10(1), 68–111.	“The logical fallacy of affirming the consequent is present in the thinking of some PA experts. If it is known that A causes B, a person who makes this error asserts then when B is present, A must be present. ... In the PA context, the expert asserts that because a child avoids one parent, the other parent must have engaged in deliberate alienation” (p. 99).	Bruch 2001, Faller 1998, Johnston 2004, Johnston 2020, Meier 2019a, Meier 2020, Mercer 2021, Milchman 2020, Thomas 2015

94 Garber 2022	Benjamin D. Garber, Dana Prescott, Chris Mulchay (2022). <i>High-Conflict Litigation: Dynamics, Not Diagnoses</i> . Chicago, IL: American Bar Association.	“In its typical form, this single-factor approach reasons that if a child is aligned with Parent A and rejecting Parent B <i>and</i> Parent B has not been found to be abusive or neglectful, then de facto Parent A must be alienating” (emphasis in original) (p. 240).	Johnston 2020, Joyce 2019, Neilson 2019
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