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Milestones a Concise History of Parental Alienation Theory

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Milestones: A Concise History of Parental Alienation Theory

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Demosthenes Lorandos is a first generation American of Greek and Australian descent. In the 1960's he studied science at the New School for Social Research in New York City. He has been a clinical and then forensic psychologist for more than five decades and is licensed at the highest level as a psychologist in California and Michigan. In the 1980's he studied law with the Jesuits at the University of Detroit and became a trial attorney admitted to practice in New York, Washington, D.C., California, Michigan, Tennessee, many Federal District Courts; as well as the Second, Sixth, Ninth, and Eleventh Federal Circuits. Dr. Lorandos has been a member of the bar of the United States Supreme Court for more than two decades. He has litigated pro hac vice in twenty additional state and federal courts.

Dr. Lorandos has been a peer reviewer for the journals of law and science. He has published a variety of peer-reviewed scientific papers as well as law review and law journal articles in the last four decades. He is a key author in science and evidence law for Thomson Reuters

Westlaw®. He has five books in print and has written numerous chapters for forensic science and legal texts. He is regularly asked to teach forensic science and legal advocacy in the continuing education programs of law and the forensic sciences. He is currently working with the senior practice area editor at Thomson Reuters Westlaw on the completion of the three-volume set, *The Litigators Handbook of Forensic Medicine, Psychiatry and Psychology*, of which Dr. Lorandos is the managing editor and lead author. Dr. Lorandos' two volume set *Cross Examining Experts in the Behavioral Sciences* is in its twentieth year of annual updates.

Abstract

Parental alienation phenomena were described centuries before the famous paper published by Richard Gardner in *The Academy Forum* in 1985. Over many years, there have been numerous steps—and a few missteps—in the growth and evolution of our understanding of the identification of parental alienation, its etiology, and its diagnosis, as well as interventions for and ultimately the prevention of this mental condition. This article identifies twelve important milestones in the history of parental alienation theory: (1) parental alienation, 1804 to 1985; (2) the contributions of Richard A. Gardner, M.D.; (3) parental alienation, 1985 to 2006; (4) criteria for the diagnosis of parental alienation; (5) books regarding parental alienation by professionals and by alienated parents; (6) child and family advocacy organizations; (7) international developments regarding parental alienation; (8) thirty-five years of legal developments regarding parental alienation; (9) interventions for mild/moderate/severe parental alienation; (10) important publications in peer-reviewed journals; (11) an epidemic of misinformation regarding parental alienation; and (12) recent landmark events in parental alienation scholarship.

Practitioner Points

- Mental health and legal professionals should be aware that between 1985 to the present time, parental alienation theory has proliferated from an individual founder to a network of scholars and practitioners all over the world.
- Researchers and writers have published hundreds of journal articles and book chapters regarding parental alienation theory, which are readily available to practitioners for further study regarding this topic.
- Alienated parents and grandparents have contributed to this movement by writing books about their lived experiences and participating in child and family advocacy organizations.

Milestones: A Concise History of Parental Alienation Theory

Over many years, there has been a remarkable panoply of terms for what we now call *parental alienation* (PA)—including “alienation of affection,” “interdependent triad,” “cross-generational coalition,” the “Medea syndrome,” “programming” and “brainwashing,” “divorce-related malicious parent syndrome,” “parental alienation syndrome,” “parental alienation disorder,” “pathological alienation,” and “resist/refuse dynamic” (Bernet, 2020, pp. 26–29; Rand, 2013).

Complementing this proliferation of terminology, the basic definition of PA has remained stable. For example, Gardner’s (1985) original description of *parental alienation syndrome* (PAS) was “a disturbance in which children are obsessed with deprecation and criticism of a parent—

denigration that is unjustified and/or exaggerated” (p. 3). Compare that with the recently proposed definition of *parental alienation relational problem* (PARP): “This category may be used when a child—usually one whose parents are engaged in a high-conflict separation or divorce—allies strongly with one parent and rejects a relationship with the other parent without a good reason” (Bernet & Baker, 2022, p. 2).

Also, Gardner (1985) identified behavioral signs that occur in alienated children: “vilification of the parent often as the quality of a litany”; “phraseology that is identical to that used by the ‘loved’ parent”; “the child may justify the alienation with memories of minor altercations experienced in the relationship with hated parent”; “the hatred of the parent often extends to include that parent’s complete extended family”; “complete lack of ambivalence”; and “a guiltless disregard for the feelings of the hated parent” (pp. 3–4). The same behaviors are featured in Factor 5 of the Five-Factor Model for the diagnosis of PA (Bernet & Greenhill, 2022).

Despite the constancy of basic principles of PA theory, our understanding of the etiology, diagnosis, prevention, and interventions for PA has evolved and expanded. At times, PA scholars have proceeded down dead-ends and had to turn around. At times, proponents of PA theory have disagreed about nuances, such as criteria for the diagnosis of PA and the best interventions for mild/moderate/severe levels of PA. Of course, contemporary PA scholars are standing on the shoulders of pioneers and hopefully can see both the past and the future more distinctly.

This article describes twelve important events or themes in the history of PA theory. This account is not intended to be comprehensive, since that would require a book with many chapters. However, we hope that this overview of the history of PA theory will be helpful to mental health and legal practitioners, researchers, policy makers, and alienated family members who are interested in this topic.

Parental Alienation, 1804 to 1985

There is nothing new about the alienation of a child's affection from a parent. Children have been alienated, brainwashed, estranged, kidnapped, and manipulated by family members for much of recorded history. An early reported case of a child's abduction from her parent—an extreme form of alienating behavior—began at the turn of the nineteenth century when Leonard Thomas De Manneville "... snatched his nursing daughter from the breast of his wife" (*King v. De Manneville*, 1804; Wright, 2002, p. 182). Another early case of persistent alienating behavior found the romantic poet Percy Bysshe Shelley losing his bid to have his children returned to him from their maternal grandparents (*Shelley v. Westbrook*, 1817). When the children's mother drowned herself in the Serpentine in 1816, the family suppressed information about the suicide and shut Shelley out of his children's lives. Shelley fought for his children, but the alienating grandparents went to Chancery Court and claimed that Shelley was a published atheist and an advocate of sexual freedom and therefore "immoral" (Doolittle, 2007; Volokh, 2006). In 1818, the Chancery Court presided over a case of PA, where George Nugent, Earl of Westmeath, accused his wife Emily Cecil, daughter of the Marquess of Salisbury, of having an affair with the Duke of Wellington (*Earl of Westmeath v. Countess of Westmeath*, 1826). Nugent secreted that

child away at the home of his friend, the Duke of Buckingham, where they poisoned the child's sense of her mother such that the child told her mother: "Papa and the Duke of Buckingham have pointed out what sort of woman you were. I never wish to see your face again" (Stone, 1993, pp. 313–314).

Historians Richard K. Stephens and Linda Gunsberg (2010) demonstrated with archival newspaper reports dozens of historic cases of PA. They illustrated alienation with a February 8, 1974, copy of the American Bar Association's (ABA) nationally syndicated column *Family Lawyer*. The cover picture depicts a mother pedagogically holding up a picture of "Dad" to a young child. And the ABA caption reads: "Poisoning the child's mind." Before the work of mental health professionals concerning alienation was understood by the courts in America, two early cases stand out. In the 1980s case of *Schutz v. Schutz* (1988), the appellate court noted the mother's "... assiduous and unfortunately largely successful efforts both to secrete physically the parties' two daughters from their father and to poison their hearts and minds against him" (p. 874). Also, Family Court Judge David F. Jung sat through lengthy hearings in *Karen B. v. Clyde M.* (1991). In this case, the 4-year-old girl allegedly told her mother she had been abused by her father. The mother took the child to numerous health and social work professionals, many of whom testified in court that they found no evidence of abuse. Among other witnesses, the evaluator and the child's law guardian testified that they believed the mother programmed her daughter to accuse the father of abuse so that she could gain custody. Judge Jung concluded: "In the opinion of this court, any parent that would denigrate the other by casting the false aspersion of child sex abuse and involving the child as an instrument to achieve his or her selfish purpose

is not fit to continue in the role of parent. ... Like Medea, she is ready to sacrifice her child to accomplish her selfish goal” (p. 801).

Early mental health research into PA phenomena can be found in the work of numerous scholars. David M. Levy (1943) described fathers ineffectively protesting against what he called a mother–child monopoly (p. 153). Wilhelm Reich (1949) described parental battling over their children where the true motive was revenge (p. 265). Psychiatrist Louise Despert (1953) observed custodial parents alienating the children and wrote, “This can be a temporary relief to the parent who does so, but it can do only hurt to the child” (p. 63). Psychiatrist Murray Bowen (1961) described alienating mothers “in an extreme overadequate position” (p. 49). Psychiatrist Phillip J. Resnick (1969) wrote about parents who engaged “in a deliberate attempt to make their spouses suffer” (p. 330). Jack Westman and colleagues (1970) were writing about cases where one parent appeared to deliberately undermine the other through a child. Salvador Minuchin (1974) described a parent joining the child “in a rigidly bounded cross-generational coalition against the other parent” (p. 102). Psychologists Judith Wallerstein and Joan Kelly (1976) described what they termed aligned children who formed a relationship with one parent. They argued that this relationship was specifically aimed at the exclusion or active rejection of the other (p. 266).

Writing in the *Journal of Psychiatry and Law*, Alan Levy (1978) described children who were pathologically unambivalent, where their statements seemed “well-rehearsed, almost programmed ... often repeating the exact phraseology used by the preferred parent.” He offered

that these children "... can be described as having been brainwashed by that parent" (p. 207).

Janet Johnston, Linda Campbell, and Sharon Mayes (1985) described alliances where "... strong, consistent, overt (publicly stated) verbal and behavioral preference for one parent together with rejection and denigration of the other" was observed (p. 569). Also, psychiatrists Elissa Benedek and Diane Schetky (1985) described hostile, vindictive parents who "... pressure the child to take sides." They offered that very young children "... may be particularly susceptible to brainwashing and come to believe that the horrible things one parent says about the other are true" (p. 868).

Richard A. Gardner, M.D.

After medical school and training in general psychiatry and child psychiatry, Richard Gardner began conducting evaluations in high-conflict, child custody disputes. By the early 1980s he had read the work of Levy, Despert, Bowen, Minuchin, and others and he also began to see children who had been alienated from one of their parents. In twenty years of custody cases, Gardner was struck by what he saw as indoctrination of a child by one parent to denigrate the other. As a physician, Gardner recorded a cluster of behaviors that he saw together and so termed the cluster, a *parental alienation syndrome* (PAS). When trying to describe this cluster of maladaptive activities, Gardner also noticed a phenomenon he had not seen before: false sexual abuse accusations. As far back as the 1960s, Gardner saw children, adolescents, and adults who had been sexually abused; up to the early 1980s, there was little reason for him to believe that these patients were not telling him the truth. However, some of the children who manifested PAS related incredible scenarios of their alleged sexual abuse, some of which were so preposterous that he considered them impossible. These circumstances prompted his groundbreaking 1985

article in a publication of the American Academy of Psychoanalysis, *The Academy Forum*.

Gardner subsequently published peer-reviewed articles and several books regarding PA and related phenomena: *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), and *The Parental Alienation Syndrome: A Guide for Mental Health and Legal Professionals* (1992, 1998),

Gardner's influence shaped professional guidelines for child custody evaluations and related topics. For example, when the American Psychological Association (1994) published Guidelines for Child Custody Evaluations in Divorce Proceedings, Gardner was cited more than any other individual authority in the "Pertinent Literature" section of the document. He was a consultant to the Work Group on Quality Issues, a component of the American Academy of Child Psychiatry (1997), when they prepared Practice Parameters for the Forensic Evaluation of Children and Adolescents Who May Have Been Physically or Sexually Abused. In *Children Held Hostage* (Clawar & Rivlin, 1991)—published by the American Bar Association—33 percent of the citations in the bibliography have "parental alienation," "parental alienation syndrome," or "alienation" in their titles. Gardner's work was cited 23 times. Following Gardner's numerous contributions, hundreds of scholars have published journal articles, books, and legal treatises regarding PA (Harman, Warshak, Lorandos, & Florian, 2022).

Gardner was a prolific writer, and his interests and influence went beyond child custody evaluations and PAS. During 45 years of practice as a psychiatrist, Gardner wrote 40 books and

more than 130 articles, dozens of which peer-reviewers recommended for publication in scholarly journals. His contributions to the field of psychotherapy with children of divorce and custody evaluations are considered classic works in the field and are often cited in the professional literature and in textbooks. In 1970, Gardner wrote *The Boys and Girls Book About Divorce*, the first self-help book for children of divorce. It was lauded by *Time* magazine, was excerpted in the *New York Times Magazine*, and is still being used today in psychotherapy with children. He devised a therapeutic technique—"mutual storytelling"—that is included in child psychiatry curriculums and listed as one of 35 significant events in the history of play therapy. Gardner created a therapeutic modality with his introduction of the first board game for use in psychotherapy with children. The use of such games, following Gardner's lead, has become standard in child psychotherapy. Gardner's books and therapeutic games have been translated into many languages. (See Warshak, 2006.)

Parental Alienation, 1985 to 2006

During the early years of the development of PA theory, after Gardner's foundational work, several scholars made their own observations and published articles and books regarding PA. For example, Richard Sauber, a professor of family and clinical psychology, began to see alienation in the families he and his doctoral students were treating. In 1976, Sauber became the founding editor of *The American Journal of Family Therapy*. In that role he observed a significant growth in submissions describing child alienation, drawing on the work of Levy, Despert, Bowen, Resnick, Minuchin, and Gardner. In the 1980's and 1990's, many journals published research on PA as well as the recent phenomenon of false sexual abuse allegations in high-conflict divorce litigation (Blush & Ross, 1987; Clawar & Rivlin, 1991; Darnall, 1999; Kopetski, 1998a, 1998b;

Lampel, 1996; Rand, 1997a, 1997b; Turkat, 1995; Wakefield & Underwager, 1991; Warshak, 1999).

Gardner's colleague, Richard Warshak (2001a, 2010a), wrote an important book, *Divorce Poison*, which was ultimately published in several languages and became the most widely read book in the world regarding PA. At about the same time, Gardner assembled an international group of scholars, which occurred in Washington, DC, in 2000. At that conference, researchers from several countries gathered to discuss the phenomenon that some called enmeshment, others called brainwashing, and still others described as an alienation syndrome. Gardner subsequently developed a book proposal and arranged for its publication. Following Gardner's death in 2003, Sauber and psychologist/attorney Demosthenes Lorandos completed the book with 34 chapters of research and commentary on high-conflict family dysfunction, which became *The International Handbook of Parental Alienation Syndrome: Conceptual, Clinical and Legal Considerations* (Gardner, Sauber, & Lorandos, 2006). In subsequent years, PA scholars published many more books and peer-reviewed articles in mental health and legal professional journals.

The Diagnosis of Parental Alienation

The *Diagnostic and Statistical Manual of Mental Disorders* is published by the American Psychiatric Association (APA, 2022), most recently the Fifth Edition, Text Revision (DSM-5-TR). When DSM-5 was being developed, a group of scholars proposed that PA be included as either "parental alienation disorder" or "parental alienation relational problem" (Bernet, 2010; Bernet, Boch-Galhau, Baker, & Morrison, 2010). In response, the leadership of the DSM-5 Task

Force—i.e., Darrel A. Regier, Daniel S. Pine, and David Shaffer—agreed on the reality of PA phenomena. However, they repeatedly said that PA could not be considered a *mental disorder* because it does not “reside inside” the designated patient. Instead, they said that PA is a *mental condition*—specifically, a relational problem—because it occurs between the designated patient (usually a child) and another person (usually a parent).

Although the words “parental alienation” were not included when DSM-5 (APA, 2013) was published, the *concept* of PA was included in three different diagnoses in the chapter called “Other Conditions That May Be a Focus of Clinical Attention.” Each of these conditions paraphrases the meaning of PA in their respective definitions:

- Child affected by parental relationship distress (CAPRD) = “... negative effects of parental relationship discord (e.g., high levels of conflict, distress, or disparagement) on a child in the family” (p. 716).
- Parent–child relational problem = “... negative attributions of the other’s intentions, hostility toward or scapegoating of the other, and unwarranted feelings of estrangement” (p. 715).
- Child psychological abuse = “... harming/abandoning ... people or things that the child cares about” (p. 719).

Practitioners were advised that if they identified a case of PA, they could use one or more of those terms to classify the client, depending on the focus of clinical attention. That is, CAPRD was appropriate if the focus was on the mental condition of the child; parent–child relational problem was appropriate if the focus was on the relationship between the child and the rejected

parent; and child psychological abuse was appropriate if the focus was on the alienating behaviors of the favored parent (Bernet, Wamboldt, & Narrow, 2016).

In 2022, it was the right time to propose again that *parental alienation relational problem* (PARP) be included in DSM-5-TR (APA, 2022). During the intervening years a large amount of qualitative and quantitative research had been published regarding PA in major peer-reviewed journals such as *Psychology*, *Public Policy*, and *Law* (Warshak, 2020b), *Developmental Psychology* (Harman et al., 2022), and *The Journal of the American Academy of Child and Adolescent Psychiatry* (Bernet & Greenhill, 2022). Thus, the “Proposal for Parental Alienation Relational Problem to be Included in ‘Other Conditions That May Be a Focus of Clinical Attention’ in DSM-5-TR” (Bernet & Baker, 2022) was submitted to the DSM-5-TR Steering Committee in November 2022. The proposal was endorsed by almost 3,000 individuals and organizations. As of the publication of this article, the proposal was being considered by various components of the APA.

Books, Books, Books

Almost 200 books and book chapters that relate to PA have been published (Bernet & Baker, 2022). Most of these books were written by mental health professionals and were intended for their mental health and legal colleagues. The following examples are in chronological order:

- *Adult Children of Parental Alienation Syndrome: Breaking the Ties That Bind* (Baker, 2007). Baker was the first psychologist to conduct systematic research regarding PAS

and PA. In this research project, she collected the life stories of adults who had previously experienced PAS as children.

- *The Parental Alienation Syndrome: A Family Therapy and Collaborative Systems Approach to Amelioration* (Gottlieb, 2012). Gottlieb explained how techniques from structural family therapy can be used to heal the relationship between the child and the alienated parent.
- *Children Who Resist Postseparation Parental Contact: A Differential Approach for Legal and Mental Health Professionals* (Fidler, Bala, & Saini, 2012). This is an empirically based review of PA, which integrates research evidence with clinical insight from interviews with leading scholars and practitioners.
- *Working with Alienated Children and Families: A Clinical Guidebook* (Baker & Sauber, 2013). The editors and their colleagues explained various interventions for families experiencing PA.
- *Parental Alienation: The Handbook for Mental Health and Legal Professionals* (Lorandos, Bernet, & Sauber, 2013). This was a comprehensive book, which contained chapters on the phenomenology of PA, the assessment of contact refusal, interventions for various levels of PA, legal strategies, and international aspects of PA.
- *Parental Alienation—Science and Law* (Lorandos & Bernet, 2020). This book explained the research that creates the foundation for the assessment, identification, and intervention in cases of PA. It also explained the scientific basis for testimony and legal decisions that relate to PA. The chapter authors refuted widespread

misinformation regarding PA, which had appeared in journals, books, and presentations intended for mental health and legal professionals.

In addition to books written by and for professionals, many books were published by victims of PA who described their lived experiences—alienated parents, alienated grandparents, and adults who had previously been alienated children. The following examples are in chronological order:

- *They Are My Children, Too: A Mother's Struggle for Her Sons* (Meyer, 1999). The author (from the United Kingdom) narrates a harrowing and heartbreaking account of international child abduction. This book records the determination of one woman fighting for her children and of the inadequacy of current international laws against child abduction.
- *A Kidnapped Mind: A Mother's Heartbreaking Story of Parental Alienation Syndrome* (Richardson & Broweleit, 2006). The author (from Canada) related how her son Dash suffered from PA at the hands of his father. She spent years battling Dash's father, the legal system, their psychologist, the school system, and Dash himself to protect her son—first from his father, then from himself.
- *A Family's Heartbreak: A Parent's Introduction to Parental Alienation* (Jeffries & Davies, 2009). This is a story of a father's struggle to maintain a normal, loving relationship with his young son. It proceeds from the emotionally devastating actions of the child's other parent to a court system and mental health community ill-equipped to deal with this destructive family dynamic.

- *Don't Hug Your Mother* (Byrne & Byrne, 2016). Two brothers (from Ireland) relate the difficulties they experienced when their parents separated. The book recounts episodes of their dark past in harrowing detail, including PA.
- *For the Love of Eryk: Surviving Divorce, Parental Alienation and Life After* (McCall, 2016). The author shares his personal experience with PA, which was so severe that it led to the death of his son Eryk. The boy was killed by his mother when she lost her parental rights as the courts finally saw through her alienating behaviors.
- *Half the Child* (McGee, 2018). This book takes place over four consecutive summers in the lives of Michael and his son Ben. It chronicles the separation, divorce, custody battle, and abduction that threaten to tear apart father and son. Ultimately, they write their own love story.
- *Parent Deleted: A Mother's Fight for Her Right to Parent* (Darné, 2017). This a gripping tale of a non-biological, lesbian mother's fight for her children. It is a courageous, disturbing exposé of an emergent social justice frontier: the rights of all children to be with their parents.
- *From Heartbreak to Healing: Resolving Parental Alienation* (Koch, 2020). Using her personal narrative to set the stage, the author summarizes current research and clinical understanding of PA, presenting it in an easy-to-understand way for parents to apply to their own lives.
- *The Respondent* (Ellis, 2021). The book cover says: "They kidnapped his children. They stole his freedom. They shattered his family. The author's harrowing, true story

is one shared by millions of fathers and boys forsaken and harmed by the American divorce machine.”

Child and Family Advocacy Organizations

As time progressed, interest in PA quickly spread from mental health and legal practitioners—who learned about this topic during their professional activities—to family members who directly experienced PA in their own lives, especially alienated parents and grandparents. There was an explosion of interest in PA on the internet (more than 1.5 million hits on a Google search of “parental alienation”) and on social media (e.g., hundreds of Facebook groups devoted to PA, some with thousands of members).

There are many child and family advocacy organizations, which provide support to alienated family members, encourage scholarly activities, and try to influence local and national legislation. The long list of advocacy organizations includes the following examples, which are in alphabetical order:

- Alienated Children First (ACF) is a charitable organization in Ireland whose mission is to educate and raise awareness about PA and provide resources to parents, children, and legislators about the issue. <https://alienated.ie/>
- Association Contre L’Alienation Parentale (ACALPA) is an apolitical and independent organization in France which is committed to defending the right of children to maintain contact with their two families at the time of separation of their parents. www.acalpa.info

- The Change for Children creates positive change in the family law system in the United Kingdom, where broken families fail to access the support they need to protect their children. <https://www.thechangeforchildren.com/>
- COLIBRI-ITALIA is the national and European coordinator of associations that share the themes of the fundamental rights of childhood and post-separative parenting. <https://www.colibri-italia.it/>
- *Contemporary Family Magazine* publishes international quarterly issues for thousands of parents and family professionals across disciplines, and is a tool for family professionals, policy makers, child advocates, and parents seeking to improve child outcomes. <https://contemporaryfamilymagazine.com/>
- Eeny Meeny Miney Mo Foundation develops strategies to increase community awareness and understanding of PA in Australia, develops prevention strategies to reduce the prevalence of PA, and provides information and resources about PA to children, parents, and service providers. <https://emmm.org.au/>
- Family Access – Fighting for Children’s Rights brings awareness and education regarding PA as well as support to alienated family members. www.familyaccessfightingforchildrensrights.com/
- Global Action for Research Integrity – Parental Alienation (GARI-PA) is a non-governmental organization established by professionals, researchers, and students from all over the world, interested in promoting legitimate research regarding PA and child abuse in strict adherence to Human Rights principles. <https://garipa.org/>

- Good Egg Safety is a non-profit Community Interest Company and leading child safety campaigner in the United Kingdom. They work closely with both the Scottish and UK governments on evidence-based national child safety programs.
www.goodeggsafety.com
- Happy Parenting Malta (For Happier Children) is a community-based organization that has as its main goal the well-being of those children who find themselves being alienated from one of their parents and the improvement of the parent–child relationships. <https://happyparentingmalta.com/>
- International Council on Shared Parenting (ICSP) advances scientific knowledge on the needs and rights of children whose parents are living apart and formulates evidence-based recommendations about the legal, judicial, and practical implementation of shared parenting. <https://www.twohomes.org/>
- International Support Network of Alienated Families (ISNAF) is a large support network for those suffering the pain and bewilderment of losing a child due to the dynamics of PA. <https://isnaf.info/>
- La Dolce Vita is a therapeutic counselling charity in Northern Ireland supporting those impacted by domestic abuse, sexual abuse, and PA. www.la-dolce-vita-project.com
- National Parents Organization (NPO) improves the lives of children by protecting every child’s right to the love and care of both parents after separation or divorce.
<https://www.sharedparenting.org/>

- Parental Alienation Study Group (PASG)—with members from 65 countries—educates mental health and legal professionals and the general public regarding the causes, evaluation, prevention, and treatment of PA. PASG has organized international conferences in Washington, DC, Stockholm, Sweden, Brussels, Belgium, and Ft. Collins, Colorado. www.pasg.info
- Parental Alienation Syndrome Intervention (PASI) deals with domestic violence by proxy, which involves coercive control and parental alienating behaviors. This organization is dedicated to ending child psychological abuse and PA through education, research, free online support groups, legal processes, and legislation. www.pas-intervention.org

International Developments

PA theory initially developed in the United States due to the influence of Richard Gardner starting in 1985. Rather quickly, however, interest in this topic spread to Europe and other continents. The first comprehensive book regarding PA theory, *The International Handbook of Parental Alienation Syndrome* (Gardner et al., 2006), featured chapter authors from Australia, Canada, the Czech Republic, Germany, Israel, Sweden, the United Kingdom, and the United States. The earliest events and publications in Europe regarding PA—prior to 2000—include the following:

- In Sweden in 1992, Gardner lectured regarding PAS at a conference. Subsequently, PA was described in a book about memory and suggestibility, *Hemligheter och*

minnen. Att utreda tillförlitlighet i sexualbrottmål [Secrets and Memories: To Investigate Reliability in Sexual Criminal Cases] (Hellblom Sjögren, 1997).

- In Norway in 1994, Gardner discussed the concept of PAS when he spoke at a conference called “Seksuelle overgrep mot barn rettssikkerhet og rasjonalitet” [“Child Sexual Abuse, Justice, and Rationality”]. Also, Norwegian anthropologist, Jan Brögger (1995) published “Når barn utvikler sykkelig hat mot foreldre” [“When children develop morbid hatred toward parents”].
- In Germany, the first mention of PAS in the professional literature was by Wolfgang Klenner (1995), who wrote “Rituale der Umgangsvereitelung bei getrennt lebenden oder geschidenen Eltern” [“Rituals of contact refusal from parents in separation or divorce”]. Also, Ursula Kodjoe (a forensic psychologist) and Peter Koeppel (a family law attorney) (1998) published papers, which prompted discussion among mental health and legal professionals in Europe regarding PAS. Kodjoe, Koeppel, Wilfrid von Boch-Galhau, and Walter Andritzky organized the International Conference on Parental Alienation Syndrome, which was held in Frankfurt am Main, Germany, in October 2002. Gardner was a featured presenter at that conference (see Figure 1). The proceedings of the Frankfurt conference were published the following year in German and English (Boch-Galhau, Kodjoe, Andritzky, & Koeppel, 2003).
- In the Czech Republic, psychologist Eduard Bakalář wrote extensively regarding PA, including an article, “Popouzení dítěte proti druhému rodiči” [“Inciting the child against the other parent”] (Bakalář & Novák, 1996).

- In Italy, Isbaella Buzzi (1997) contributed a chapter regarding PAS to *Separazione, Divorzio e Affidamento dei Figli* [Separation, Divorce, and Child Custody]. Also, Professor Guglielmo Gulotta (1998) published “La syndrome di alienazione genitoriale: Definizione e descrizione” [The parental alienation syndrome: Definition and description”].
- In the United Kingdom, prolific writer Ludwig F. Lowenstein (1998) published “Parental alienation syndrome: A two-step approach toward a solution.”

Very quickly, PA was observed, and PA theory was written about in many countries. For example: Argentina (Pedrosa & Bouza, 2008); Australia (Berns, 2001); Belgium (Vanderheyden, 2008); Brazil (Dias, 2006); Canada (Worenklein, 1992); Finland (Hannuniemi, 2007), France (Bensussan, 2009); Israel (Gottlieb, 2006); Mexico (international congress, “Síndrome de Alienación Parental,” in Monterey, Mexico, June 2009); Poland (Namysłowska, Heitzman, & Siewierska, 2009); South Africa (Szabo, 2002); and Spain (Aguilar, 2004). These are only examples for the purpose of illustration. The Parental Alienation Database (<https://ckm.vumc.org/pasg/> at Vanderbilt University Medical Center, Nashville, Tennessee) itemizes more than 1,000 journal articles, book chapters, and books regarding PA theory and related topics.

Thirty-Five Years of Legal Developments

Since 1985, there has been a large growth in the recognition of PA by the courts. Lorandos (2013) surveyed 2,746 cases from the United States and Canada where the family courts wrestled with alienation. Lorandos (2020a) improved this research and reviewed 3,555 American

appellate cases in which alienation was mentioned. The methodology for this research was analyzed again, subjected to detailed editorial review, and published in a special issue of *Family Court Review*. The findings were clear: after subjecting the 3,555 appellate cases to strict inclusion/exclusion criteria, 1,181 cases between 1985 and 2018 were identified, in which the construct of PA was determined to be material to the litigation, probative of essential facts under consideration, relevant to the immediate fact-finding needs of the court, admissible, and discussed at length. This research put to rest the claims that the topic of PA was not admissible under strict expert evidentiary standards.

Internationally, the Canadian courts have long acknowledged that “alienation is a serious allegation ... [and] should be proved” in a court of law (*Williamson v. Williamson*, 2016, paragraph 47). Following the international child abduction case of Sean Goldman in August 2010, Brazil became the first country to adopt national legislation regarding PA (Brockhausen, 2013). Further, in 2017, Brazil took another important step in its fight against PA. It promulgated a new law that classifies PA as “criminal conduct” in the form of “psychological violence” (Presidência da República, 2017). In 2004, the Federal District of Mexico was the first jurisdiction to adopt a reference to PA in its civil code (Dum, 2013). By 2018, several Mexican states had enacted laws prohibiting PA; the Mexican Supreme Court reviewed them and kept them in place with a request for editorial changes (Diario Oficial, 2018).

In England, the country’s Child and Family Court Advisory and Support Service (Cafcass), a public body set up to promote the welfare of children and families involved in family courts,

warned that “parental alienation is responsible for around 80% of the most intransigent cases that come before the family courts” (Hill, 2016). And now, “The concept of alienation ... may today be regarded as mainstream” in courts in the United Kingdom (*Re S*, 2011). The European Court of Human Rights is a court of last resort when the highest courts of member countries fail to adequately intervene in serious cases of PA. *Mincheva v. Bulgaria* (2010), *Case of K.B. and Others v. Croatia* (2017), and *Aneva and Others v. Bulgaria* (2017) provide examples. Finally, in India in 2017, the Supreme Court addressed the term “Parental Alienation Syndrome” and discussed its “psychological destructive effects” (*Singh v. Singh*, 2017).

Interventions for Mild/Moderate/Severe Parental Alienation

Assessment of alienation in a child is straightforward. Recent research recommends the Five-Factor Model for the diagnosis of PA (Bernet & Greenhill, 2022; Freeman, 2020). The five factors are: (1) the child actively avoids, resists, or refuses a relationship with a parent; (2) presence of a prior positive relationship between the child and the now rejected parent; (3) absence of abuse or neglect or seriously deficient parenting on the part of the now rejected parent; (4) use of multiple alienating behaviors by the favored parent; and (5) exhibition of many or all of the eight behavioral manifestations of alienation by the child.

One of the most important accomplishments in the history of PA theory has been designing interventions that depend on the severity of alienation. Generally, recommendations regarding interventions are based on whether the alienation symptoms and behaviors of the child are mild, moderate, or severe; in some circumstances, recommendations may also be based on whether the level of alienating behaviors of the favored parent are mild, moderate, or severe. Usually,

intervention attempts should be monitored by the court that has immediate jurisdiction over the family (Warshak, 2020a).

Mild PA refers to cases in which the child objects to having a relationship with the rejected parent, but they go for the assigned parenting time and has a good time once they are outside the control of the favored parent. In these cases, typical interventions include strongly worded instructions for the parents and children. Examples are: ordering the parents to stop exposing the child to conflict; ordering the favored parent to stop undermining the child's relationship with the targeted parent; and instructing the child (especially older children) to cooperate with the parenting plan and follow the court ordered schedule. Alienating parents often state that they value and support the children having a positive relationship with the targeted parent, yet they insidiously undermine and damage the relationship between that parent and their children. For these reasons, instructions must include sanctions for a parent who does not comply. A parenting coordinator who has experience working with families affected by PA can help document such noncompliance for the court so that consequences can be swift.

Moderate PA refers to cases in which the child objects to having a relationship with the rejected parent but goes for the assigned parenting time; in the household of the rejected parent, the child is predominantly defiant and oppositional, although there may be brief interludes when they interact with that parent in a positive manner. Interventions for cases of moderate PA are additive to those specified for mild cases and focus more on changing the behavior of the parents. For example, Multimodal Family Intervention (Walters & Friedlander, 2016). This usually takes the

form of reducing the amount of conflict and improving communication. In addition to the use of a parenting coordinator, individual counseling should be arranged: for the alienating parent to address their mental health issues and teach them how to stop indoctrinating the child against the target parent; for the child to help them avoid the parents' battles and have a healthy relationship with both parents; and for the targeted parent to help them be less frustrated and improve parenting skills. Too many therapists spoil the process as they are often susceptible to manipulation by the alienating parent. All providers should work closely with a parenting coordinator to provide adherence information and updates to the court. Sanctions should be imposed immediately for alienating parents who violate court orders. It is essential to ensure that alienated children have ample time with the targeted parent so that they can experience corrective interactions and positive experiences.

Severe PA means that the child consistently and adamantly refuses contact and may hide or run away to avoid being with the rejected parent. If the child does have parenting time with the targeted parent, the child is persistently defiant and oppositional. The repertoire of maladaptive behaviors of alienated children should never be underestimated (Lorandos, 2020b). When a child is trapped in a severe level of PA, the alienating parent is usually obsessed with destroying the child's relationship with the target parent. The favored parent tends to be convinced of the righteousness of their behavior and have little or no insight. Swift reversal of custody is often recommended in these severe situations after all other attempts have failed, along with reunification therapy with the targeted parent that is specifically designed to treat parental alienation (Templer, Matthewson, Haines, & Cox, 2017). Because this parent will typically

continue to undermine the reunification with the targeted parent, it is usually necessary to transfer custody of the child to the rejected parent and require the alienating parent to have no contact with the child for 90 days. The length of time may be extended or shortened depending upon the behavior of the alienating parent. Therefore, the response to the abuse needs to be significant.

According to Clawar and Rivlin (2013), change of custody and increased social contact with the targeted parent are the best ways to deprogram a child who has been brainwashed and severely alienated. There are empirically supported intensive family counseling and education workshops that are available. Programs such as Family Bridges (Lorandos, 2020b; Warshak, 2010b, 2019) and Turning Points for Families (Harman, Saunders, & Afifi, 2021) have been effective in working with severely alienated families and have been empirically validated.

Severe PA is a serious child protection issue (Harman, Kruk, & Hines, 2018; Kruk, 2018). Engaging in persistent alienating behaviors is child psychological abuse, which is no less serious than other forms of child abuse such as sexual abuse and neglect. The child abusing behaviors of alienating parents must be addressed to achieve lasting progress in ameliorating this condition (Harman & Matthewson, 2020). In cases where severe PA has occurred, close monitoring of the abusive, alienating parent needs to occur so that the child is not re-traumatized by alienating behaviors the parent may resume following successful reintegrative treatment with the target parent. Custody reversal and sequestered workshop treatment for severely alienated children are not traumatizing, and they positively impact the child and alienated parent's relationships

(Lorandos, 2020b; Warshak, 2019). The ultimate goal is for the child to have healthy, positive relationships with both parents, and this cannot be done when one parent is actively alienating and abusing a child.

Peer-Reviewed Journals

There has been a significant growth in high quality qualitative and quantitative research about this form of child psychological abuse in recent decades. However, Lorandos (2020c) points out that in the last 35 years there have been a number of published articles and book chapters doubting the existence of the concept. And a curious circumstance has arisen. On one hand there is high quality, peer-reviewed research on PA published in prestigious journals. On the other we find many legal notes, bar journal and law review articles, lectures, newspaper stories, and websites where law students, attorneys, ex-lawyers, and law professors critique the social science literature and research related to PA; and social workers, psychologists, and a nurse focusing on the rules of evidence and PA. In most of these articles and student papers, the critics have left their fields of expertise and seem to be drifting too far from shore. Five recent articles in prestigious peer-reviewed journals illustrate this trend.

Harman, Bernet, and Harman (2019) responded to the meme that the concept of PA was built on inadequate methodological grounds and lacks consensus among professionals. Publishing in *Current Directions in Psychological Science*, they found that research on PA has increased substantially over recent decades and offered that today, there are over 1,000 books, book chapters, and articles in professional journals on the topic across 35 countries and six continents. They concluded that there is a robust consensus about what PA is and that the trend line in

quality research on the topic demonstrated that there was clearly a “blossoming” of this field of study.

Many critics of PA theory have expressed the concern that custody evaluators and also courts have prematurely and inappropriately concluded that children of divorcing parents were alienated, when actually there were other explanations for the children’s contact refusal. In a comprehensive manner, Warshak (2020b) addressed the problem of “false positive identifications of parental alienation—concluding the parental alienation exists in cases where it really does not” (p. 54). He explained several alternative explanations for contact refusal, i.e., individual and family circumstances that do not constitute PA: “normal reactions to parental separation,” “behavior reflecting a difficult temperament or emotional problems,” “reluctance to leave a parent who needs emotional support,” “situation-specific resistance to being with a parent,” “feeling closer to or having more support with one parent,” “feeling more comfortable in one parent’s home,” and “typical adolescent psychological functioning” (pp. 58–60).

Another trope of the nonscientists was that PA was merely a concoction of violent men served up when “protective” women accused these men of abuse. In 2019 an American law professor and several colleagues published what they described as a research paper in a non-reviewed online university series. Harman and Lorandos (2020) turned the conclusions of the law professor’s paper into hypotheses and tested each of them against 967 American family law cases. They published each step of their work on the *Open Science Framework*. Seven of these hypotheses were tested in a methodologically rigorous way and many errors and perhaps data falsifications

were found. The results were thoroughly reviewed and vetted and published in the prestigious journal *Psychology, Public Policy, and Law*.

Another favorite myth of the willfully blind is that despite the consensus of professionals described in the *Directions in Psychological Science* review (Harman et al., 2019), there simply is not any methodologically sound research on PA out there. Taking up this challenge, Harman et al. (2022) undertook a comprehensive literature review across four electronic databases. Using strict qualification criteria, the team identified 213 documents with empirical data on PA published in 10 languages up to December 2020. They found that the current state of PA scholarship met criteria of a maturing field of scientific inquiry: (1) an expanding literature; (2) a shift toward quantitative studies; and (3) a growing body of research that tests theory-generated hypotheses. The detailed study, tables, and graphics were reviewed by a panel of scientists and published in the American Psychological Association journal, *Developmental Psychology*.

PA skeptics have frequently argued that there is no systematic way to distinguish PA from other causes of contact refusal, such as parental estrangement. Considerable progress has been made to address that concern. For example, the Five-Factor Model (Bernet & Greenhill, 2022) can be used to diagnose PA. Also, there are objective tests that help to identify alienated children (e.g., Baker, Burkhard, & Albertson-Kelly, 2012; Rolands, 2018). Bernet, Gregory, Rohner, and Reay (2020) used the Parental Acceptance-Rejection Questionnaire (PARQ) to distinguish severely alienated from nonalienated children; the PARQ was 99% accurate in differentiating those two groups of participants. The findings were published in the rigorously peer-reviewed *Journal of*

Forensic Sciences. Of course, the PARQ is not a “test for PA,” but does consistently identify the mental process of splitting, which is one of the important signs manifested by alienated children.

An Epidemic of Misinformation

Since its inception, PA scholarship has been an unusual field of study. Although there have been hundreds of authoritative publications regarding PA—that is, case studies, qualitative research, and quantitative research in journals, book chapters, and encyclopedias—there has also been a proliferation of misinformation and disinformation published regarding this topic.

Misinformation refers to false statements that are distributed, regardless of the author’s intent to mislead the reader. Disinformation, on the other hand, refers to statements that are deliberately misleading or biased; disinformation is spreading misinformation in a purposeful manner.

There are two methods for documenting, analyzing, and discussing PA misinformation. First, it is possible to identify various types of misinformation and themes that have occurred and provide examples of each category. The following types of misinformation are in *Italic font*:

- *PA does not exist*: “It is still troubling that the court admitted the PAS testimony at all, given the serious issues as to whether PAS even exists” (Jaffe, Lemon, & Poisson, 2002, p. 96).
- *PA is not recognized by professional organizations*: “All legitimate organizations of professionals in the field have condemned the use of PAS” (Goldstein, n.d.).

- *PA theory is bad science*: “The discredited ‘diagnosis’ of ‘PAS’ (or allegation of ‘parental alienation’), quite apart from its scientific invalidity ...” (Dalton, Drozd, & Wong, 2006, p. 24).
- *Richard Gardner advocated for pedophilia*: “Richard Gardner ... advocated many deviant sexual behaviors, including sexual sadism, child sexual abuse, necrophilia ... as supposedly beneficial, normal behaviors” (Zorza, 2010, p. 1-23).

All of these statements are false and can be refuted with documents published by professional organizations, empirical research published in peer-reviewed journals, and other authoritative resources. At times, it seems like the PA scholars and PA detractors are living in two different universes.

The second method for studying PA misinformation in a systematic manner is to identify examples of the *same misinformation* that was published in journal articles and book chapters over many years. And then, examine each article to determine whether earlier articles containing misinformation were cited by subsequent articles containing the same misinformation. An elaborate research project (Bernet, 2021; Bernet & Xu, 2022) studied variations of the following statement, which seriously misrepresents PA theory: “Parental alienation theory assumes that the favored 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 favored parent.” Of course, no PA practitioner “assumes” that all children who manifest contact refusal were indoctrinated to do so by the favored parent. However, Bernet and Xu

(2022) identified 94 examples of the *same misinformation* in journals, book chapters, and government documents between 1994 and 2022. The data were subjected to citation analysis, which demonstrated an unbroken succession of citations from one author to the next to the next through those 29 years.

PA scholars—starting with Richard Gardner—have methodically refuted false statements regarding PAS/PA and regarding Gardner himself. For example, Gardner (2002) published an article, “Misinformation Versus Facts About the Contributions of Richard A. Gardner, M.D.” His article opened with the statement, “For many years I have seen myself misrepresented, my work distorted, and various fabrications and even delusions about me have been promulgated” (p. 395). Gardner systematically refuted and clarified numerous false statements that had been made about him and his work, including the most common ad hominem attack, “Dr. Gardner supports and is fully sympathetic to the practice of pedophilia” (p. 406). Also, Warshak (2001b, 2015) published comprehensive discussions of major misunderstandings and disputes regarding PA, such as the mistaken idea that children never reject a parent in an unreasonable or irrational manner.

On some occasions, PA scholars have been able to specifically contradict and refute misinformation that had recently been published by submitting a new article to the same journal. Occasionally, the objectionable article and the accurate article were published back-to-back. For example:

- Clemente, Padilla-Racero, Gandoy-Crego, Reig-Botella, and Gonzalez-Rodriguez (2015) published an article in the *American Journal of Family Therapy* that included unsubstantiated and incorrect assertions about Gardner and PAS. In response, Baker, Gottlieb, and Verrocchio (2016) published a commentary on Clemente et al. in the same journal.
- Puppo (2018) submitted a letter to the editor of the *Journal of Forensic Sciences*, which contained much misinformation and criticisms of the concept of PAS. Bernet (2018) submitted a response to Puppo, which was published in the same issue of the journal.
- The editors of *The Judges' Journal* invited a PA scholar and PA critics to submit articles—pro and con—regarding this topic. Thomas and Richardson (2015) published “Parental Alienation Syndrome: 30 Years on and Still Junk Science.” In reply, Bernet (2015) published “Parental Alienation: Misinformation Versus Facts.”

It seems inevitable that this epidemic of PA misinformation will continue, and it will require continuous monitoring and corrections. It is our expectation that some articles and books—which are particularly egregious—will be withdrawn from publication.

Recent Landmark Events in Parental Alienation Scholarship

The history of PA scholarship has featured hundreds of individuals (practitioners, researchers, lawyers, parents, and grandparents) and scores of organizations (university affiliated research groups, professional organizations, and family and child advocacy groups). Recently, two organizations in Europe—Parental Alienation Europe (based in Ireland) and the Institute of

Family Therapy and Systemic Practice, Malta—have stood out as a result of their collaboration in important projects.

First, Brian O’Sullivan (representing PAE) and Charlie Azzopardi (representing IFTM) were co-directors of the first academically accredited postgraduate program in the world in the field of Parental Alienation Studies. IFTM is licensed by the Malta Further and Higher Education Authority and is thus authorized to grant postgraduate credit for individuals who successfully complete the course of Parental Alienation Studies. This course is a comprehensive, professional training program focused upon identifying, assessing, and intervening with individuals and families experiencing PA. The course is intended for professionals and others currently or considering working with children, young people, and families across the social, mental health, statutory and voluntary sectors who wish to enhance their qualifications and to gain contemporary theoretical knowledge and skills. Although the lectures occur in English, the graduates have been legal and mental health professionals from Australia, Canada, China, Hong Kong, Iceland, Ireland, Malta, New Zealand, Russia, South Africa, the United States, and the United Kingdom.

Second, PAE and IFTM collaborated in launching the first peer-reviewed academic journal devoted to the exploration and discussion of PA. The *European Journal of Parental Alienation Practice* will publish this article, “Milestones: A Concise History of Parental Alienation Theory.” Although there have been numerous newsletters and blogs that addressed PA theory and practice, EJPAP is the first scholarly journal to focus on that topic. The EJPAP has an

Editorial Board of scholars with expertise in PA; and it will be important for the editors to exercise due diligence in peer reviewing articles for this new journal. Of course, the postgraduate Parental Alienation Studies and the EJPAP will coordinate their activities in order to enhance the scholarship of both programs.

Future Milestones

It will be interesting and challenging to make predictions regarding milestones for PA theory and practice, which will occur during the next ten or twenty years. Although burdened with speculation, it is important for the next generation of PA scholars and family advocates to think about the best ways to educate practitioners, researchers, and policy makers regarding the identification of, interventions for, and prevention of PA. The authors of this article regarding “Milestones” participated in many of the events described in this concise history of PA theory. However, it is time for us to step back and make room for our friends and colleagues, who are young and energetic, to carry on these important tasks. We express our deep appreciation for the alienated children and the rejected parents and grandparents who have taught us so much about the heartbreak of PA and also the joyful reunifications that sometimes occur. Also, we appreciate the family lawyers, judges, and legal scholars who have contributed to our understanding of the realities of PA. Finally, of course, best wishes to the leadership of PAE and IFTM as they launch the *European Journal of Parental Alienation Practice*.

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References

- Aguilar, J. M. (2004). *S.A.P.: Síndrome de Alienación Parental [PAS: Parental alienation syndrome]*. Córdoba, Spain: Almuzara.
- Aneva and others v. Bulgaria* (2017), Applications Nos. 66997/13, 77769/14, 50240/15, Judgment Apr. 6, 2017.
- American Academy of Child Psychiatry (1997). Practice parameters for the forensic evaluation of children and adolescents who may have been physically or sexually abused. *Journal of the American Academy of Child and Adolescent Psychiatry*, 36(10 Suppl), 37S–56S. doi.org/10.1097/00004583-199710001-00004.
- American Psychiatric Association (2013). *Diagnostic and statistical manual of mental disorders* (5th ed.). Washington, DC: Author.
- American Psychiatric Association (2022). *Diagnostic and statistical manual of mental disorders* (5th ed., text revision). Washington, DC: Author.
- American Psychological Association (1994). Guidelines for child custody evaluations in divorce proceedings. *American Psychologist*, 49(7), 677–680. doi:10.1037/0003-066X.49.7.677
- Bakalář, E., & Novák, D. (1996). Popouzení dítěte proti druhému rodiči [Inciting the child against the other parent]. *Průvodce rozvodem [A guide through divorce]* (pp. 133–142). Prague, Czech Republic: Lidové noviny.
- Baker A. J. L., Burkhard, B., & Albertson-Kelly, J. (2012). Differentiating alienated from not alienated children: A pilot study. *Journal of Divorce and Remarriage*, 53(3), 178–193. doi:10.1080/10502556.2012.663266

- Baker, A. J. L., Gottlieb, L. K., & Verrocchio, M. C. (2016). The reality of parental alienation: Commentary on “Judicial decision-making in family law proceedings,” by Clemente, Padilla-Racero, Gandoy-Crego, Reig-Botella, and Gonzalez-Rodriguez. *American Journal of Family Therapy*, 44, 46–51. doi:10.1080/01926187.2015.1133984
- Benedek, E. P., & Schetky, D. H. (1985). Custody and visitation: Problems and perspectives. *Psychiatric Clinics of North America*, 8(4), 857–873. doi.org/10.1016/S0193-953X(18)30660-9
- Bensussan, P. (2009). L’aliénation parentale: Vers la fin du déni? [Parental alienation: Toward the end of denial?]. *Annales Médico-psychologiques*, 167(6), 409–415. doi:10.1016/J.AMP.2009.05.008
- Bernet, W. (Ed.) (2010). *Parental alienation, DSM-5, and ICD-11*. Springfield, IL: Charles C Thomas.
- Bernet, W. (2015). Parental alienation: Misinformation versus facts. *Judges’ Journal*, 54(3), 23, 25–27.
- Bernet, W. (2018). Author’s response. *Journal of Forensic Sciences*, 63(1), 343–344. doi:10.1111/1556-4029.13661
- Bernet, W. (2020). Introduction to parental alienation. In D. Lorandos & W. Bernet, *Parental alienation – Science and law* (pp. 5–43). Springfield, IL: Charles C Thomas.
- Bernet, W. (2021). Recurrent misinformation regarding parental alienation theory. *American Journal of Family Therapy*, 1–15. doi:10.1080/01926187.2021.1972494

- Bernet, W., & Baker A. J. L. (2022). Proposal for parental alienation relational problem to be included in “Other conditions that may be a focus of clinical attention” in DSM-5-TR. Retrieved from <https://www.parp-dsm.info>
- Bernet, W., Boch-Galhau, W. v., Baker, A. J. L., & Morrison, S. L. (2010). Parental alienation, DSM-V, and ICD-11. *American Journal of Family Therapy*, 38(2), 76–188. doi:10.1080/01926180903586583
- Bernet, W., & Greenhill, L. L. (2022). The Five-Factor Model for the diagnosis of parental alienation. *Journal of the American Academy of Child and Adolescent Psychiatry*, 61(5), 591–594. doi:10.1016/j.jaac.2021.11.026
- Bernet, W., Gregory, N., Rohner, R. P., & Reay, K. M. (2020). Measuring the difference between alienation and estrangement: The PARQ-Gap. *Journal of Forensic Sciences*, 65(4), 1225–1234. doi:10.1111/1556-4029.14300
- Bernet, W., Wamboldt, M. Z., & Narrow, W. E. (2016). Child affected by parental relationship distress. *Journal of American Academy of Child and Adolescent Psychiatry*, 55(7), 571–579. doi:10.1016/j.jaac.2016.04.018
- Bernet, W., & Xu, S. (2022). Scholarly rumors: Citation analysis of vast misinformation regarding parental alienation theory. *Behavioral Sciences and the Law*. Retrieved from doi:10.1002/bsl.2605
- Berns, S. S. (2001). Parents behaving badly: Parental alienation syndrome in the family court – Magic bullet or poisoned chalice. *Australian Journal of Family Law*, 15(3), 191–214.
- Blush, G. J., & Ross, K. L. (1987). Sexual allegations in divorce: The SAID syndrome. *Family Court Review*, 25(1), 1–11. doi:10.1111/j.174-1617.1987.tb00155

- Boch-Galhau, W. v., Kodjoe, U., Andritzky, W., & Koeppel, P. (Eds.) (2003). *Das parental alienation syndrome (PAS) / The parental alienation syndrome (PAS)*. Berlin: Verlag für Wissenschaft und Bildung.
- Bowen, M. (1961). Family psychotherapy. *American Journal of Orthopsychiatry*, 31, 40–60.
doi:10.1111/j.1939-0025.1961.tb02106.x
- Brockhausen, T. (2013). Parental alienation and the new Brazilian law. In D. Lorandos, W. Bernet, & S. R. Sauber (Eds.), *Parental alienation: The handbook for mental health and legal professionals* (pp. 463–484). Springfield, IL: Charles C Thomas.
- Brögger, J. (1995, January 21). Når barn utvikler sykelig hat mot foreldre [When children develop morbid hatred toward parents]. Oslo, Norway: Aftenposten.
- Buzzi, I. (1997). La sindrome di alienazione genitoriale [Parental alienation syndrome]. In V. Cigoli, G. Gulotta, & G. Santi (Eds.), *Separazione, divorzio e affidamento dei figli: Tecniche e criteri della perizia e del trattamento [Separation, divorce and child custody: Techniques and criteria of expertise and treatment]* (pp. 177–187). Milan, Italy: Giuffrè.
- Case of K.B. and Others*, Application, No. 36216/13, (Mar. 14, 2017).
- Clawar, S. S., & Rivlin, B. V. (1991). *Children held hostage: Dealing with programmed and brainwashed children*. Chicago, IL: American Bar Association Press.
- Clawar, S. S., & Rivlin, B. V. (2013). *Children held hostage: Identifying brainwashed children, presenting a case, and crafting solutions* (2nd ed.). Chicago, IL: American Bar Association Press.

- Clemente M., Padilla-Racero, D., Gandoy-Crego, M., Reig-Botella, A., & Gonzalez-Rodriguez, R. (2015). Judicial decision-making in family law proceedings. *American Journal of Family Therapy*, 43, 314–325. doi:10.1080/01926187.2015.1051895
- Dalton, C., Drozd, L. M., & Wong, F. Q. F. (2006). *Navigating custody & visitation evaluations in cases with domestic violence: A judge's guide*. Reno, NV: National Council of Juvenile and Family Court Judges.
- Darnall, D. (1999). Parental alienation: Not in the best interest of the children. *North Dakota Law Review*, 75, 323–364.
- Despert, L. J. (1953). *Children of divorce*. Garden City, NJ: Doubleday Books.
- Diario Oficial (2018, May 16). Sentencia dictada por el Tribunal Pleno de la Suprema Corte de Justicia de la Nación en la Acción de Inconstitucionalidad 11/2016. Retrieved from www.dof.gob.mx/nota_to_doc.php?codnota=5522808
- Dias, M. B. (2006, July 25). Síndrome da alienação parental, o que é isso [Parental alienation syndrome, what is it?]. *Revista Jus Navigandi*, 11(1119). Retrieved from <https://jus.com.br/artigos/8690>
- Doolittle, M. (2007). Fatherhood, religious belief and the protection of children in nineteenth-century English families. In H. Rogers & T. Broughton (Eds.), *Gender and fatherhood in the nineteenth century: Gender and history* (pp. 31–42). New York: Palgrave Macmillan.
- Dum, C. (2013). Parental alienation initiatives around the world. In D. Lorandos, W. Bernet, & S. R. Sauber [Eds.], *Parental alienation: The handbook for mental health and legal professionals* (pp. 425–462). Springfield, IL: Charles C Thomas.
- Earl of Westmeath v. Countess of Westmeath*, 162 Eng. Rep. 992 (1826).

- Freeman, B. W. (2020). The psychosocial assessment of contact refusal. In D. Lorandos & W. Bernet [Eds.], *Parental alienation – Science and law* (pp. 44–81). Springfield, IL: Charles C Thomas.
- Gardner, R. A. (1970). *The boys and girls book about divorce*. New York: Jason Aronson.
- Gardner, R. A. (1985). Recent trends in divorce and custody litigation. *Academy Forum*, 29(2), 3–7.
- Gardner, R. A. (2002). Misinformation versus facts about the contributions of Richard A. Gardner, M.D. *American Journal of Family Therapy*, 30(5), 395–416.
doi:10.1080/01926180260296305
- Gardner, R. A., Sauber, S. R., & Lorandos, D. (2006). *The international handbook of parental alienation syndrome: Conceptual, clinical, and legal considerations*. Springfield, IL: Charles C Thomas.
- Goldstein, B. (n.d.). Parental alienation syndrome: The hoax that hurts children. Website, National Organization for Men against Sexism. Retrieved from <https://nomas.org/child-custody/parental-alienation-syndrome-hoax-hurts-children/>
- Gottlieb, D. S. (2006). Parental alienation syndrome – An Israeli perspective: Reflections and recommendations. In R. A. Gardner, S. R. Sauber, D. Lorandos (Eds.), *The international handbook of parental alienation syndrome: Conceptual, clinical and legal considerations* (pp. 90–107). Springfield, IL: Charles C Thomas.
- Gulotta, G. (1998). La sindrome di alienazione genitoriale: Definizione e descrizione [The parental alienation syndrome: Definition and description]. *Pianeta infanzia [Childhood Planet]*, 4, 27–36.

- Hannuniemi, A. (2007). Vanhemmasta vieraannuttaminen: Uhka lasten hyvinvoinnille [Alienating a child from one parent: A threat to children's wellbeing]. *Oikeustiede: Suomalaisen lakimiesyhdistyksen vuosikirja [Jurisprudence: Yearbook of the Association of Finnish Lawyers]*, 40, 5–126.
- Harman, J. J., Bernet, W., & Harman, J. (2019). Parental alienation: The blossoming of a field of study. *Current Directions in Psychological Science*, 28(2), 212–217.
doi:10.1177/0963721419827271
- Harman, J. J., Kruk, E., & Hines, D. (2018). Parental alienating behaviors: An unacknowledged form of family violence. *Psychological Bulletin*, 144, 1275–1299.
doi:10.1037/bul0000175
- Harman, J. J., & Lorandos, D. (2021). Allegations of family violence in court: How parental alienation affects judicial outcomes. *Psychology, Public Policy, and Law*, 27(2), 184–208. doi.org/10.1037/law0000301
- Harman, J. J., & Matthewson, M. (2020). Parental alienating behaviors. In D. Lorandos & W. Bernet [Eds.], *Parental alienation – Science and law* (pp. 82–101). Springfield, IL: Charles C Thomas.
- Harman, J. J., Saunders, L., & Afifi, T. (2022) Evaluation of the Turning Points for Families (TPFF) program for severely alienated children. *Journal of Family Therapy*, 44(2), 279–298. doi:10.1111/1467-6427.12366
- Harman, J. J., Warshak, R. A., Lorandos, D., & Florian, M. J. (2022). Developmental psychology and the scientific status of parental alienation. *Developmental Psychology*, 58(10), 1887–1911. doi:10.1037/dev0001404

- Hellblom Sjögren, L. (1997). *Hemligheter och minnen: Att utreda tillförlitlighet i sexualbrottmål* [*Secrets and Memories: To investigate reliability in sexual criminal cases*]. Stockholm, Sweden: Norstedts Juridik.
- Hill, A. (2016). Programme aims to help people affected by “parental alienation.” *The Guardian*, July 14, 2016. Retrieved from <https://www.theguardian.com/society/2016/jul/14/programme-aims-to-help-people-affected-by-parental-alienation>
- Jaffe, P. G., Lemon, N. K. D., & Poisson, S. (2002). *Child custody and domestic violence: A call for safety and accountability*. Thousand Oaks, CA: Sage Publications.
- Johnston, J. R., Campbell, L. E. G., & Mayes, S. S. (1985). Latency children in post-separation and divorce disputes. *Journal of the American Academy of Child Psychiatry*, 24(5), 563–574. doi:10.1016/S0002-7138(09)60057-1
- Karen B. v. Clyde M.*, 151 Misc.2d 794, 574 N.Y.S.2d 267 (N.Y. Fam. Ct. 1991).
- King v. De Manneville*, 5 East 221, 102 Eng. Rep. 1054 (K.B. 1804).
- Klenner, W. (1995). Rituale der Umgangsvereitelung bei getrenntlebenden oder geschiedenen Eltern [Rituals of contact refusal from parents in separation or divorce]. *Zeitschrift für das gesamte Familienrecht* [*Journal for Entire Family Law*], 42(24), 1529–1535.
- Kodjoe, U., & Koeppel, P. (1998). Früherkennung von PAS – Möglichkeiten psychologischer und rechtlicher Interventionen [Early diagnosis of PAS – Possibilities of psychological and juridical interventions]. *Kindschaftsrechtliche Praxis* [*Practice of Child Law*], 1(5), 138–144.

- Kopetski, L. M. (1998a). Identifying cases of parent alienation syndrome: Part I. *Colorado Lawyer*, 27(2), 65–68.
- Kopetski, L. M. (1998b). Identifying cases of parent alienation syndrome: Part II. *Colorado Lawyer*, 27(3), 61–64.
- Kruk, E. (2018). Parental alienation as a form of emotional child abuse: Current state of knowledge and future directions for research. *Family Sciences Review*, 22, 141–164. doi:10.26536/evms9266
- Lampel, A. K. (1996). Children's alignment with parents in highly conflicted custody cases. *Family & Conciliation Courts Review*, 34(2), 229–239. doi:10.1111/j.174-1617.1996.tb00416.x
- Levy, A. M. (1978). Child custody determination – A proposed psychiatric methodology and its resultant case typology. *Journal of Psychiatry and Law*, 6(2), 189–214.
- Levy, D. M. (1943). *Maternal overprotection*. New York, NY: Columbia University Press.
- Lorandos, D. (2013). Parental alienation in North American law. In D. Lorandos, W. Bernet, & S. R. Sauber [Eds.], *Parental alienation: The handbook for mental health and legal professionals* (pp. 348–424). Springfield, IL: Charles C Thomas.
- Lorandos, D. (2020a). Parental alienation in U.S. courts, 1985 to 2018. *Family Court Review*, 58(2), 322–339. doi:10.1111/fcre.12475
- Lorandos, D. (2020b). Parental alienation, traditional therapy, and Family Bridges: What works, what doesn't, and why (Part 1). *American Journal of Family Law*, 33(4), 415–423.

- Lorandos, D. (2020c). Admissibility of the concept – Parental alienation. In D. Lorandos & W. Bernet [Eds.]. *Parental alienation – Science and law* (pp. 424–364). Springfield, IL: Charles C Thomas.
- Lowenstein, L. F. (1998). Parent alienation syndrome: A two-step approach toward a solution. *Contemporary Family Therapy: An International Journal*, 20(4), 505–520.
- Mincheva v. Bulgaria*, Application No 21558/03, Judgment Sept. 2, 2010.
- Minuchin, S. (1974). *Families and family therapy*. Cambridge, MA: Harvard University Press.
- Namysłowska, I., Heitzman, J., & Siewierska, A. (2009). Zespół Gardnera – Zespół oddzielenia od drugoplanowego opiekuna (PAS). Rozpoznanie czy rzeczywistość rodzinna? [Gardner syndrome – Parental alienation syndrome (PAS). Diagnosis or family reality?]. *Psychiatria Polska [Polish Psychiatry]*, 43(1), 5–17.
- Pedrosa, D. S., & María Bouza, J. (2008). *(SAP) Síndrome de Alienación Parental. Proceso de obstrucción del vínculo entre los hijos y uno de sus progenitores [(PAS) Parental alienation syndrome. Process of obstructing the bond between the child and parent]*. Buenos Aires, Argentina: García Alonso.
- Presidência da República (2017), Casa Civil, Subchefia para Assuntos Jurídicos, Lei Nº 13.431, April 4, 2017. Retrieved from www.planalto.gov.br/ccivil_03/_Ato2015-2018/2017/Lei/L13431.htm
- Puppo, V. (2018). Commentary on: An objective measure of splitting in parental alienation: The Parental Acceptance-Rejection Questionnaire. *Journal of Forensic Sciences*, 63(1), 342. doi:10.1111/1556-4029.13660

- Rand, D. C. (1997a). The spectrum of parental alienation syndrome (Part 1). *American Journal of Forensic Psychology*, 15(3), 23–52.
- Rand, D. C. (1997b). The spectrum of parental alienation syndrome (Part 2). *American Journal of Forensic Psychology*, 15(4), 39–92.
- Rand, D. C. (2013). The history of parental alienation from early days to modern times. In D, Lorandos, W. Bernet, & S. R. Sauber (Eds.), *Parental alienation: The handbook for mental health and legal professionals* (pp. 291–321). Springfield, IL: Charles C Thomas.
- Reich, W. (1949). *Character-analysis* (3rd ed.) (T. P. Wolfe, trans.). New York, NY: Noonday Press.
- Re S (a child) (transfer of residence: consent order) [2011] 1 FLR 1789.*
- Resnick, P. J. (1969). Child murder by parents: A psychiatric review of filicide. *American Journal of Psychiatry*, 126(3), 325–334. doi:10.1176/ajp.126.3.325
- Rowlands, G. A. (2018). Parental alienation: A measurement tool. *Journal of Divorce and Remarriage*, 60, 316–331. doi:10.1080/10502556.2018.1546031
- Schutz v. Schutz*, 522 So.2d 874 (Fla. Dist. Ct. App. 1988).
- Shelley v. Westbrook*, 37 Eng. Rep. 850 (Ch. 1817).
- Singh v. Singh*, No. 3962 of 2016, Supreme Ct. of India, Judgement Feb. 13, 2017.
- Stephens, R. K., & Gunsberg, L. (2010). History speaks for itself: The phenomenon and emotional pain of parental alienation. Canadian Symposium for Parental Alienation Syndrome. New York, NY, October 2–3, 2010.
- Stone, L. (1993). *Broken lives: Separation and divorce in England, 1660–1857*. London, United Kingdom: Oxford University Press.

- Szabo, C. P. (2002). Parental alienation syndrome. *South African Psychiatry Review*, 5(3), 1.
- Templer, K., Matthewson, M., Haines, J., & Cox, G. (2017). Recommendations for best practice in response to parental alienation: Findings from a systematic review. *Journal of Family Therapy*, 39(1), 103–122. doi:10.1111/1467-6427.12137
- Thomas, R. M., & Richardson, J. T. (2015). 30 years on and still junk science. *Judges' Journal*, Summer 2015, 22, 24.
- Turkat, I. D. (1995). Divorce related malicious mother syndrome. *Journal of Family Violence*, 10(3), 253–264. doi:10.1007/BF02110992
- Vanderheyden, J-E. (2008). *Approcher le divorce conflictuel [Approaching the conflictual divorce]*. Malonne, Belgium: Feuilles Familiales.
- Volokh, E. (2006). Parent–child speech and child custody speech restrictions. *New York University Law Review*, 81, 631–733.
- Wallerstein, J. S., & Kelly, J. B. (1976). The effects of parental divorce: Experiences of the child in later latency. *American Journal of Orthopsychiatry* 46(2), 256–269. doi:10.1111/j.1939-0025.1976.tb00926.x
- Walters, M. G., & Friedlander, S. (2016). When a child rejects a parent: Working with the intractable resist/refuse dynamic. *Family Court Review*, 54(3), 424–445. doi:10.1111/fcre.12238
- Wakefield, H., & Underwager, R. (1991). Sexual allegations in divorce and custody disputes. *Behavioral Sciences and the Law*, 9, 451–468. doi:10.1002/bsl.2370090408

- Warshak, R. A. (1999). Psychological syndromes: Parental alienation syndrome. In R. Orsinger (Ed.), *Expert Witness Manual* (chapter 3-32). Dallas, TX: State Bar of Texas, Family Law Section.
- Warshak, R. A. (2001a). *Divorce poison: Protecting the parent–child bond from a vindictive ex*. New York, NY: ReganBooks.
- Warshak, R. A. (2001b). Current controversies regarding parental alienation syndrome. *American Journal of Forensic Psychology*, 19(3), 29–59.
- Warshak, R. A. (2006). Dedicated to Richard A Gardner, M.D. In R. A. Gardner, S. R. Sauber, & D. Lorandos (Eds.), *The international handbook of parental alienation syndrome: Conceptual, clinical and legal considerations* (pp. v–vi). Springfield, IL: Charles C Thomas.
- Warshak, R. A. (2010a). *Divorce poison: How to protect your family from badmouthing and brainwashing* (2nd ed.). New York, NY: Harper Paperbacks.
- Warshak, R. A. (2010b). Family Bridges: Using insights from social science to reconnect parents and alienated children. *Family Court Review* 48(1), 48–80. doi:10.1111/j.1744-1617.2009.01288.x
- Warshak, R. A. (2015). Ten parental alienation fallacies that compromise decisions in court and in therapy. *Professional Psychology, Research and Practice*, 46(4), 235–249. doi:10.1037/pro0000003
- Warshak, R. A. (2019). Reclaiming parent–child relationships: Outcomes of Family Bridges with alienated children. *Journal of Divorce & Remarriage*, 60, 645–667. doi:10.1080/10502556.2018.1529505

- Warshak, R. A. (2020a). Parental alienation: How to prevent, manage, and remedy it. In D. Lorandos & W. Bernet (Eds.), *Parental alienation – Science and law* (pp. 142–206). Springfield, IL: Charles C Thomas.
- Warshak, R. A. (2020b). When evaluators get it wrong: False positive IDs and parental alienation. *Psychology, Public Policy, and Law*, 26(1), 54–68. doi:10.1037/law0000216
- Westman, J. C., Cline, D. W., Swift, W. J., & Kramer, D. A. (1970). Role of child psychiatry in divorce. *Archives of General Psychiatry*, 23(5), 416–420. doi:10.1001/archpsyc.1970.01750050032005
- Williamson v. Williamson*, 2016 BCCA 87, 395 DLR (4th) 510.
- Worenklein, A. (1992). Custody litigation and parental alienation. *International Journal of Psychology*, 27(3–4), 226–226.
- Wright, D. C. (2002). The crisis of child custody: A history of the birth of family law in England. *Columbia Journal of Gender and Law*, 11, 175–270.
- Zorza, J. (2010). Child custody practices of the family courts in cases involving domestic violence. In M. T. Hannah & B. Goldstein (Eds.), *Domestic violence, abuse, and child custody: Legal strategies and policy issues* (pp. 1-1 – 1-32). Kingston, NJ: Civic Research Institute.



Figure 1. Richard A. Gardner presented the keynote address at the International Conference on Parental Alienation Syndrome, which was held in Frankfurt am Main, Germany, in October 2002.