



Letter to the Editor

Yes, children are susceptible to manipulation: Commentary on article by Clemente and Padilla-Racero

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ARTICLE INFO

Article history:

Received 4 July 2015

Accepted 5 July 2015

Available online 18 July 2015

Keywords:

Parental alienation

False memory

Forensic psychology

Withdrawal from publication

ABSTRACT

The recently published article by Clemente and Padilla-Racero made incorrect statements regarding Richard Gardner and the mental condition that he identified, parental alienation syndrome. Clemente and Padilla-Racero conducted research on children and concluded, "Gardner's ideas about parental alienation syndrome, and in particular the ease of parental manipulation of children, were not empirically verified." When we reviewed the data from their own research, we arrived at the opposite conclusion, i.e., that over 40% of child subjects, age 6 to 12, were manipulated by adult suggestion to describe a non-event. We conclude that the data of Clemente and Padilla-Racero were consistent with Gardner's theory that a parent can influence a child to make false statements about the other parent and to develop false beliefs and ultimately false memories of non-events. That article, which features misinformation and methodological flaws, should be withdrawn from publication.

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Clemente and Padilla-Racero (2015) recently published a research paper in *Children and Youth Services Review*, which was titled, "Are children susceptible to manipulation? The best interest of children and their testimony." The purpose of their research was to test empirically the concept of parental alienation syndrome (PAS), a clinical condition that was described 30 years ago by Richard Gardner (1985). We identified many serious problems with the research design of Clemente and Padilla-Racero, their conclusions, and the text of the published paper. We appreciate the willingness of the editorial staff of *Children and Youth Services Review* to consider the publication of this commentary, which we hope will clear up the misunderstandings and errors that appeared in the Clemente and Padilla-Racero article.

1. Definition of parental alienation

The paper by Clemente and Padilla-Racero and also this commentary pertain to PAS, which is usually referred to as parental alienation (PA) by contemporary writers. For purposes of this commentary, PAS and PA are the same thing. PAS/PA is a mental condition in which a child – usually one whose parents are engaged in a high-conflict separation or divorce – allies himself strongly with one parent (the preferred parent or alienating parent) and rejects a relationship with the other parent (the target parent) without legitimate justification. The child's rejection

of the target parent must be without justification for the child to be considered alienated; if a parent has been severely neglectful or abusive, the child's rejection of that parent is understandable and does not constitute PA. Most contemporary writers use *parental alienation* to describe a child's rejection of a parent without a good reason; they use *parental estrangement* to describe a child's rejection of a parent for a good reason, such as a history of abuse or neglect. With that distinction in mind, estrangement is typically caused by the rejected parent's own behavior; alienation is usually caused by the preferred parent's indoctrination or brainwashing of the child to fear or dislike the rejected parent.

2. Summary of Clemente and Padilla-Racero research

In their recently published research, Clemente and Padilla-Racero studied 300 children, age 6 to 12, who attended school in La Coruña, Spain. During the first phase of the study (Day One), one-half of the students witnessed an act of verbal aggression, i.e., a pretend dispute between two of the research personnel. The other half of the students saw the two researchers, but without the pretend verbal aggression. In the second phase of the study (Day Two), the students were given additional information in order to see whether they would be influenced to change their descriptions of the events they had observed on Day One. The additional information did not significantly influence the children to change their accounts of the events that they witnessed. Clemente and Padilla-Racero reported that almost 95% of the children who witnessed the aggression stated truthfully that they saw it, even after being given additional information. These data conform to what

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we generally expect of children, i.e., that most children give accurate information about events that they personally observed.

The more significant part of the research pertained to the second half of the students, those who did not observe any verbal aggression between the research personnel. Those children were subjected to suggestive questioning. The authors said, "The children were asked if they had seen something strange the previous day and if they had noticed any conflict between the two people who taught the class, in order to detect whether – having not seen anything but faced with pressure from the question – they invented anything." The authors observed, "In the case where there was no aggression, just over 40% of children report that something strange had happened, and they said they actually realized that an incident had happened which in reality had not happened." That was a remarkable finding, with over 40% of the children in the Clemente and Padilla-Racero study describing a non-event as a result of suggestive questioning by an adult. That is consistent with the writings of Gardner (1985) and many others (Clawar & Rivlin, 2013; Lorandos, Bernet, & Sauber, 2013; Warshak, 2010a), who described how children sometimes make up false allegations regarding the rejected parent in the context of parental alienation.

3. Irrelevant material in published article

In addition to the research summarized in this commentary, the paper by Clemente and Padilla-Racero has an unusual amount of material that has nothing at all to do with their research or the conclusions that they reported. The extraneous material flows from the polemical nature of the paper, i.e., the authors' intention to criticize PAS/PA in whatever way they could and to promote a negative, political-ideological view of PAS/PA, which their evidence does not accomplish. We consider the following sections of the paper to be extraneous and irrelevant to both the research that Clemente and Padilla-Racero reported and the formulation of PAS and PA:

- Discussion of the various names that have been used for PAS (p. 102)
- Difference between "brainwashing" and "programming" (p. 102)
- Comparison of PAS and psychoanalysis (pp. 102, 103, 105)
- Extensive discussion of "truth" and "lie," such as the difference between "adequationist theory" and "constructionist conception" regarding the nature of truth (p. 102)
- The concept of "self, as an agent of moral conduct," for the postmodern individual (p. 102)
- Criticism of the Sex Abuse Legitimacy Scale (p. 103)
- Discussion of popular culture, such as Norman Bates in Alfred Hitchcock's film *Psycho* (p. 105)
- Discussion of music (Mozart) and visual art (Dali) (p. 105)
- Whether homosexuality should be considered a disease (pp. 105, 106).

4. Incorrect statements in published article

The article under discussion in this commentary has a number of statements regarding PAS and PA that are flatly incorrect. It is unknown, of course, whether the authors were simply uninformed or purposefully reflecting a bias against Gardner and his work. The misinformation promulgated by Clemente and Padilla-Racero includes the following examples.

4.1. Asserting a lack of scientific basis for PAS

The authors expressed the lack of PAS science in several ways. They said, "The truth is that PAS, from a scientific point of view, is virtually unknown" (p. 101). Clemente and Padilla-Racero said that they found 54 articles regarding PAS in "a search of the 'Web of Knowledge' electronic database." Then, "This is a clear sign of the limited – we would say nonexistent – scientific importance of the subject."

However, in our own search of the *Web of Science* database, we identified 93 articles related to the phrase, "parental alienation" (not including books, book chapters, and book reviews). In *PubMed*, we identified 7 additional articles. In *LexisNexis*, we identified about 60 additional articles from legal journals and reviews. A popular software program (Harzing, 2007) that is used for citation analysis of psychosocial publications yielded 1000 citations (including articles in the professional literature, books, and book chapters) when asked to search for the phrase "parental alienation." (One thousand citations are the maximum that the Harzing program allows for a search.) It is incorrect to say that the scientific importance of PAS is "nonexistent."

4.2. Incorrect statements regarding PAS theory and practice

Clemente and Padilla-Racero made statements regarding PAS that were clearly incorrect. By characterizing PAS in an incorrect manner, they created a straw man that was easy for them to criticize or ridicule. For example, Clemente and Padilla-Racero said, "The hypothesis that the child is being physically or even sexually abused by her father is not contemplated and therefore not investigated" (p. 102). It is flatly incorrect to say that experts who evaluate a child for PAS do not consider the possibility that the rejected parent actually abused the child. Gardner (1999) himself published an article specifically on that topic, "Differentiating between Parental Alienation Syndrome and Bona Fide Abuse-Neglect." A recent authoritative book regarding PA stated, "It is essential to recognize that the child's rejection of the target parent is without legitimate justification. If a parent was abusive or severely neglectful, the child's rejection of that parent is understandable or legitimate and does not constitute PA" (Lorandos, Bernet, & Sauber, pp. 5–6).

Clemente and Padilla-Racero also said, "The term 'campaign of denigration' assumes that the child is lying" (citation omitted) (p. 102). Once again, that is a straw man rather than an accurate description of PAS theory. The suggestion that experts assessing PAS/PA will automatically assume that the child is "lying" is myth, not science, and is emphatically incorrect. It is correct that the "campaign of denigration" is one of the features of PAS/PA, but no experienced clinician or forensic examiner would assume that a child is lying simply on the basis of that one behavioral symptom. If the child manifests a campaign of denigration plus additional symptoms, it may be concluded that the child is experiencing PAS/PA.

4.3. Blaming PAS theory for errors made by the judicial system

Clemente and Padilla-Racero said, "[PAS] can be exploited by certain justice systems to avoid investigating potentially serious offenses against child victims: abuse, and specifically sexual abuse" (p. 101). Of course, it makes no sense to throw out the concept of PAS simply because it is theoretically possible for the concept to be misused in a legal setting. Almost every psychological or psychiatric diagnosis – the most obvious being posttraumatic stress disorder – may be misused either accidentally or purposefully by attorneys and unscrupulous expert witnesses. The solution is not to ignore or exclude testimony regarding PAS, but to study the issue and learn how to identify it accurately and treat it effectively.

4.4. Misrepresenting controversy regarding PAS

Clemente and Padilla-Racero said, "PAS is a heavily disputed concept and has been surrounded by controversy since inception" (p. 102). We agree that there has been controversy regarding some aspects of PAS theory and practice. For example: whether PA should be included in the *Diagnostic and Statistical Manual of Mental Disorders*; how to tell the difference between alienation and estrangement; and the appropriate intervention for children experiencing PAS. However, there is almost no disagreement among experienced clinicians and legal personnel regarding the central principle of PAS and PA, i.e., that some children

of separated or divorced parents ally themselves strongly with one parent and reject a relationship with the other parent without legitimate justification. At a meeting of the Association of Family and Conciliation Courts in 2010, about 300 attendees completed a brief survey regarding Baker, Jaffee, Bernet, and Johnston (2011) reported, "Nearly all of the respondents to the survey (98%) endorsed the question, 'Do you think that some children are manipulated by one parent to irrationally and unjustifiably reject the other parent?'... The survey results were overwhelming in support of the basic tenet of parental alienation."

5. Incomplete review of the literature

Clemente and Padilla-Racero did not seem to be aware of recent literature regarding PAS and PA. In their article, they included 27 references, most of which were published prior to 2000. There were only 7 references between 2011 and 2015; 3 of those recent publications were articles by Clemente and Padilla-Racero, which were also critical of Gardner and PAS. Important authors from many countries who have written about PA were not mentioned, such as: Aguilar (2005) (Spain); Baker (2007); Baker and Sauber (2012); Bernet (2010); Boch-Galhau (2013) (Germany); Brockhausen (2012) (Brazil); Clawar and Rivlin (2013); Darnall (2010); Fidler, Bala, and Saini (2012) (Canada); Gardner, Sauber, and Lorandos (2006); Gottlieb (2012); Gulotta, Cavedon, and Liberatore (2008) (Italy); Hannuniemi (2008) (Finland); Hellblom Sjögren (2012) (Sweden); Johnston, Roseby, and Kuehnle (2009); Lowenstein (2007) (United Kingdom); Pedrosa and María Bouza (2008) (Argentina); Tejedor Huerta (2007) (Spain); and Warshak (2010a, 2010b). These articles and books address the question posed by Clemente and Padilla-Racero, "Are children susceptible to manipulation?" Clemente and Padilla-Racero did not mention important reviews of quantitative research regarding PA, which were written by Saini, Johnston, Fidler, and Bala (2012) and Baker (2013). The authors did not seem to be aware of the most comprehensive book ever published regarding PA (Lorandos et al., 2013); the bibliography of that book includes hundreds of articles from professional journals, books, and book chapters from 35 countries. It is unclear why Clemente and Padilla-Racero conducted such a rudimentary literature search. Apparently, the authors were more intent upon discrediting PA and PAS by proving a polemically informed, preconceived notion, regardless of the evidence that overwhelmingly supports the reality of PA and PAS.

6. Flaws in the research design

There are several serious problems in the research reported by Clemente and Padilla-Racero in their article, "Are children susceptible to manipulation?" Consider the following.

6.1. Poor characterization of study sample

In describing the subjects who participated in their research, Clemente and Padilla-Racero said, "These children were not experiencing any adversarial proceedings between their parents, but it is believed that their situation is similar to that of children who are experiencing that situation, given the impossibility of obtaining large samples of subjects who are actually immersed in this problem." What does that mean? What are the similarities between a convenience sample of school children whose parents are not engaged in highly conflictual legal proceedings and children whose parents are engaged in such proceedings? It is not correct to refer to a likeness between two samples by citing the impossibility of obtaining large samples.

6.2. Possible contamination of independent variable

On Day One of the Clemente and Padilla-Racero study, one-half of the classes in each primary grade was exposed to a scene involving verbal aggression between two adults; one-half of the classes was exposed

to nonaggressive interaction between two adults. On Day Two, all the children were interviewed individually and asked what happened the previous day. It is possible, of course, that the children talked among themselves and compared notes as to what happened in the various classrooms. That additional information from peers may have influenced some children who did not observe an aggressive interaction to mistakenly think they had.

6.3. Inconsistent questions for the two study groups

On Day Two, research personnel interviewed all the children individually. However, they posed different questions to the two groups of children. According to the published paper, the children who had observed the scene involving aggression "were asked what they had seen." However, the children who had not observed the scene involving aggression "were asked if they had seen something strange the previous day and if they had noticed any conflict between the two people who taught the class." Clemente and Padilla-Racero explained why they followed that procedure, since they wanted to see if children in the first group told the truth and if children in the second group did not tell the truth. However, it would have been preferable to design the study so that both groups of subjects were questioned in the same manner.

6.4. Careless reporting of conclusions

In discussing their findings, Clemente and Padilla-Racero said, "Children who observed the aggression reported it without problem, and a large proportion of those who did not observe such an event had it implanted in their memory." Actually, we do not know whether the children who described witnessing a non-event had false memories; all we know is that they described an event that did not actually occur. It is possible that they simply endorsed the suggestive questions because they thought that was what the adult wanted them to say. It is possible that they lied about what they saw in their classroom because they heard stories from peers about what happened in another classroom. It is possible that the suggestive questioning caused them to have a *false belief* that they had witnessed an aggressive interaction, but they did not progress to having a *false memory* of the non-event.

7. Inaccurate comparison of research design with parental alienation

Clemente and Padilla-Racero wanted to test in a systematic manner the central premise of PAS, that children can be manipulated to have false beliefs about a parent, which assign very negative attributes to that parent. In the published study, the researchers gave false information to some of the children on Day Three of the experiment. That is, some of the children were told one or more of the following scenarios: that the person who was verbally aggressive would be their tutor soon; that the person who was verbally aggressive was a good person; and that the person who was verbally aggressive was not a good person. Then, the children were asked again what they witnessed on Day One of the experiment. Although it is hard to tell from the data how many children changed their report between Day Two and Day Three, i.e., after they were given additional information about the person who was verbally aggressive, Clemente and Padilla-Racero reported very little effect. They said, "This shows hardly any variation regardless of the degree of pressure and whether positive or negative information about the perpetrator of a negative incident is provided." The authors then said, "If we apply these ideas to what happens in court cases, we would find that if a mother tries to instill a bad image of the father in a child ..., the child would not change their opinion on this account."

With regard to that aspect of their research, the authors' conclusions were totally inappropriate. They said that research personnel were not able to influence children's opinions about a stranger in a classroom situation by providing extra information about the stranger; they then concluded that a parent would not be able to change a child's opinion

about the other parent by providing false information about that parent. There is, of course, a world of difference between those two conditions. The researcher spends a few minutes with the child in conversation about a total stranger; but the parent has months and years of day-to-day opportunities to implant negative information about the other parent.

8. Clemente and Padilla-Racero's research strongly supports Gardner's PAS

The most dramatic error in the research published by Clemente and Padilla-Racero was that the data are strongly consistent with the *opposite* of their principal conclusion. The authors summarized their data, saying, "When children did not witness any act of aggression, 40% of the subjects did in fact report that ... a problematic event occurred; that is, faced with the interviewer's demand that they report whether a problematic event had occurred, they wound up perceiving that such an event had in fact taken place. These results are consistent with our hypothesis in this regard, indicating that children who observed the aggression reported it without problem, and a large proportion of those who did not observe such an event had it implanted in their memory" (p. 106). Then, they concluded, "Therefore, the ideas suggested by Gardner are not supported by our data. It is very rare for children to lie about what they have seen, and when it does happen it consists of fabricating things that were not seen" (p. 106).

However, the authors' results are exactly what Gardner would have predicted and are exactly consistent with PAS and PA theory. That is, the typical PAS scenario is that one parent has influenced the child to have negative beliefs about the other parent, i.e., to hate and fear the other parent without a good cause. In some cases, the child's false beliefs evolve to false memories of events that never occurred. It is inexplicable why Clemente and Padilla-Racero thought that their results contradicted PAS theory; in fact, their data strongly support PAS theory. In response to the title of the original article, "Are children susceptible to manipulation?," we reply, "Yes, children are susceptible to manipulation."

9. Article by Clemente and Padilla-Racero should be retracted

The publisher of *Children and Youth Services Review*, Elsevier, has a policy regarding article withdrawal, which states, "The retraction of an article by its authors or the editor under the advice of members of the scholarly community has long been an occasional feature of the learned world" (Elsevier, 2015). Likewise, the U.S. National Library of Medicine has a similar policy: "Articles may be retracted or withdrawn by their authors, academic or institutional sponsor, editor or publisher, because of pervasive error or unsubstantiated or irreproducible data. For example, article's conclusions may have been based upon faulty logic or computation ..." (National Library of Medicine, 2015).

The recently published article by Clemente and Padilla-Racero features multiple serious errors in the research design, the text of the document, and the conclusions of the authors. The manuscript cannot be corrected adequately by any customary level of editing. Using the terminology of the Library of Medicine, the article features "pervasive error" and "conclusions ... based upon faulty logic." In order to reduce continuing confusion among the readers of this journal, we recommend that the editor and publisher of *Children and Youth Services Review* consider retracting from publication the article by Clemente and Padilla-Racero, "Are children susceptible to manipulation? The best interest of children and their testimony."

Acknowledgments

The authors of this commentary appreciate the suggestions of Amy J. L. Baker, Ph.D., Alvaro Castillo, M.Sc., Ken Lewis, Ph.D., Demosthenes Lorandos, Ph.D., J.D., and S. Richard Sauber, Ph.D.

References

- Aguilar, J.M. (2005, October-December). El uso de los hijos en los procesos de separación: El síndrome de alienación parental [The use of children in separation processes: The parental alienation syndrome [Spanish]]. *Revista de Derecho de Familia*, 29, 71–82.
- Baker, A.J.L. (2007). *Adult children of parental alienation syndrome: Breaking the ties that bind*. New York, NY: W. W. Norton.
- Baker, A.J.L. (2013). Parental alienation research and the Daubert standards. In D. Lorandos, W. Bernet, & S.R. Sauber (Eds.), *Parental Alienation: The Handbook for Mental Health and Legal Professionals* (pp. 322–347). Springfield, IL: Charles C Thomas.
- Baker, A.J.L., Jaffee, P.G., Bernet, W., & Johnston, J.R. (2011). Brief report on parental alienation survey. *The Association of Family and Conciliation Courts eNEWS*, 30(2).
- Baker, A.J.L., & Sauber, S.R. (Eds.). (2012). *Working with alienated children and families: A clinical guidebook*. New York, NY: Routledge.
- Bernet, W. (Ed.). (2010). *Parental alienation, DSM-5, and ICD-11*. Springfield, IL: Charles C Thomas.
- Boch-Galhau, W. v. (2013). *Parental alienation and parental alienation syndrome – A serious form of psychological child abuse*. With case examples. Berlin, Germany: Verlag für Wissenschaft und Bildung.
- Brockhausen, T. (2012). Alienação parental: Caminhos necessários [Parental alienation: Required paths]. *Psicologia: Ciência e Profissão: Diálogos*, 9(8), 15–17.
- 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.
- Clemente, M., & Padilla-Racero, D. (2015). Are children susceptible to manipulation? The best interest of children and their testimony. *Children and Youth Services Review*, 51, 101–107.
- Darnall, D. (2010). *Beyond divorce casualties: Reunifying the alienated family*. Lanham, MD: Taylor Trade Publishing.
- Elsevier (2015). Policies regarding withdrawal of publications. <http://www.elsevier.com/about/policies/article-withdrawal> (Last accessed April 30, 2015).
- Fidler, B.J., Bala, N., & Saini, M.A. (2012). *Children who resist postseparation parental contact: A differential approach for legal and mental health professionals*. New York, NY: Oxford University Press (Barbara Jo Fidler (Author)).
- Gardner, R.A. (1985). Recent trends in divorce and custody litigation. *Academy Forum*, 29(2), 3–7.
- Gardner, R.A. (1999). Differentiating between parental alienation syndrome and bona fide abuse-neglect. *American Journal of Family Therapy*, 27, 97–107.
- 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.
- Gottlieb, L.J. (2012). *Parental alienation syndrome: A family therapy and collaborative systems approach to amelioration*. Springfield, IL: Charles C Thomas.
- Gulotta, G., Cavedon, A., & Liberatore, M. (2008). *La Sindrome di Alienazione Parentale (PAS): Lavaggio del cervello e programmazione dei figli in danno dell'altro genitore [The parental alienation syndrome (PAS): Brainwashing and programming of children to the detriment of the other parent]*. Milan, Italy: Giuffrè.
- Hannuniemi, A. (2008). Lapsen tahdonmuodostus ja vieraannuttamisoireyhtymä huolto- ja tapaamisoikeuskäytännössä [The forming of the child's will and the parental alienation syndrome in the legal praxis of custody and visitation rights]. *Defensor Legis*, 6, 992–1016.
- Harzing, A.W. (2007). Publish or perish. <http://www.harzing.com/pop.htm> (Last accessed May 6, 2015).
- Hellblom Sjögren, L. (2012). *Barnets rätt till familjeliv. 25 svenska fall av föräldra alienation [The child's right to family life. 25 Swedish cases of parental alienation]*. Lund, Sweden: Studentlitteratur.
- Johnston, J.R., Roseby, V., & Kuehnle, K. (2009). *In the name of the child: A developmental approach to understanding and helping children of conflicted and violent divorce* (2nd ed.). New York, NY: Springer Publishing.
- Lorandos, D., Bernet, W., & Sauber, S.R. (2013). *Parental alienation: The handbook for mental health and legal professionals*. Springfield, IL: Charles C Thomas.
- Lowenstein, L.F. (2007). *Parental alienation: How to understand and address parental alienation resulting from acrimonious divorce or separation*. Lyme Regis, Dorset, United Kingdom: Russell House Publishing.
- National Library of Medicine (2015). Policy regarding retractions. <http://www.nlm.nih.gov/pubs/factsheets/errata.html> (Last accessed April 30, 2015).
- 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.
- Saini, M., Johnston, J.R., Fidler, B.J., & Bala, N. (2012). *Empirical studies of alienation. Parenting plan evaluations: Applied research for the family court* (pp. 399–441). New York, NY: Oxford University Press.
- Tejedor Huerta, A. (2007). *El Síndrome de Alienación Parental una forma de maltrato [Parental alienation syndrome is a form of abuse]*. Madrid, Spain: EOS.
- Warshak, R.A. (2010a). *Divorce poison: How to protect your family from badmouthing and brainwashing*. 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.