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Recurrent Misinformation Regarding Parental Alienation Theory

William Bernet

Department of Psychiatry, Vanderbilt University School of Medicine, Nashville, Tennessee, USA

ABSTRACT

Misinformation regarding parental alienation theory has been published many times in journals and books since the 1980s. This article discusses a specific example of misinformation, i.e., variations of the statement: *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 preferred parent.* This is an unusual phenomenon, i.e., the same misinformation was found in journal articles, books, and presentations by critics of parental alienation 40 times between 1994 and 2020. This trail of recurrent misinformation is not trivial; it is a major misrepresentation of basic tenets of parental alienation theory. The article concludes with action items, including the proposal that these false statements should be corrected and/or the journal articles should be withdrawn from publication.

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We live in an era of misinformation. Misleading statements, sloppy scholarship, and outright fraud have occurred in the literature of medicine (“COVID is a hoax.”), psychology (“Facilitated communication is a treatment for autism.”), and science (“The Apollo moon landings never occurred, but were staged by NASA.”). This article relates a pervasive pattern of misinformation that has occurred in the field of family therapy.

Parental alienation (PA) is a mental condition in which a child—usually one whose parents are engaged in a high-conflict separation or divorce—allies strongly with one parent (the favored parent) and rejects a relationship with the other parent (the alienated parent) without legitimate justification. The most common cause of PA is the child’s indoctrination by the favored parent to dislike or fear the alienated parent (Bernet, 2020a, pp. 5–6). This is a generic definition almost everyone—PA proponents as well as PA critics—recognizes and accepts.

CONTACT William Bernet  william.bernet@vumc.org  Department of Psychiatry, Vanderbilt University School of Medicine, 1313 Twenty-First Avenue South, 209 Oxford House, Nashville, TN 37232, USA

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Recurrent misinformation

Since the 1980s, misinformation regarding PA theory has been published repeatedly in peer-reviewed journals, newsletters of professional organizations, chapters, and books intended for mental health and legal practitioners (Bernet, 2020b). An important example of misinformation has been variations of this statement: *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 alienating behaviors by the favored parent.* Another version of that false statement is the same idea in reverse: *Parental alienation theory claims that anytime a favored parent engages in alienating behavior, their child inevitably becomes alienated from the other parent.*

This article refers to “PA proponents” and “PA critics.” Of course, PA proponents are not individuals who advocate on behalf of PA, but are practitioners and researchers who support the concept of PA and the validity of PA theory. PA critics include a spectrum of writers, ranging from the extreme position of denying the reality of PA altogether to the moderate position of disagreeing about definitions, terminology, and interventions. For example, some PA critics may disagree with the statement that most PA is caused by the favored parent’s indoctrination of the child to dislike or fear the alienated parent. Instead, those PA critics might say a primary causal agent cannot be identified in most cases. This apparent disagreement appears to be simply a confusion of terminology, i.e., the difference between PA and contact refusal. PA proponents say the actual definition of severe PA requires indoctrination of the child by somebody, usually the favored parent, while the definition of contact refusal includes many cases in which the causal agent cannot be identified.

Parental alienation theory

In contrast to the recurrent misinformation discussed in this paper, the following premise has been clear since parental alienation syndrome (PAS) was first defined by Richard Gardner:

The concept of the parental alienation syndrome ... includes not only conscious but subconscious and unconscious factors within the parent that contribute to the child’s alienation. Further (and this is extremely important), it includes factors that arise within the child—independent of the parental contributions—that contribute to the development of the syndrome. (Gardner, 1985, p. 3)

Neither Gardner nor any PA proponent has ever suggested in a journal article, chapter, or book that a custody evaluator may *assume* that the favored parent caused PA in the child simply because the child refuses to

visit or have a relationship with the rejected parent. The diagnosis of PA requires identifying both alienating behaviors by the favored parent and behavioral signs of PA in the child (Bernet, 2020c).

The statements discussed in this article made repeatedly by PA critics are incorrect. The recurrent misinformation discussed here is not trivial. These statements are major misrepresentations of basic tenets of PA theory, i.e., the methods clinicians and forensic practitioners use to diagnose PA in their clients and their clients' families. Also, the statements and rebuttals discussed in this article are not simply diverse opinions of professionals examining the same data. Rather, these statements are factually incorrect; they are misleading statements by PA critics regarding the writings of PA proponents. Furthermore, none of the writers quoted here provided an adequate source or a relevant reference for the misinformation they expressed; there is no source in the PA literature for the claims of these writers. For readers who need more background information, PA theory is explained comprehensively in Lorandos, Bernet, and Sauber (2013), Lorandos and Bernet (2020), and Warshak (2015).

The recurrent misinformation discussed here is a *meme* (Dawkins, 1976), that is, a concept or a phrase that takes on a life of its own after being repeated many times. It may also be described as a *woozle*, "a definitive statement based on data that are very limited, flawed, ambiguous, or erroneous. Through a number of different 'woozling' techniques, these flawed, scanty, or inaccurate data become magnified and widely disseminated, overshadowing data that would challenge it" (Nielsen, 2014, p. 2). This article documents an elaborate example of what Johnston (2007) called "scholarly rumors." She wrote, "This technique involves a cohort of scholars who misquote research and then quote one another, without checking back to the original source. This is a problem typically caused when authors who have strong ideological or activist views rely primarily upon secondary data sources The rumor may begin when there is simply some misunderstanding and miscommunication of research findings, or it may originate in more egregious use of strategies that discredit others' research findings" (p. 18).

Method

This research was prompted by articles in a newsletter (*APSAC Advisor*, published in April 2020) and presentations at a webinar (APSAC Virtual Colloquium, September 22, 2020), which were intended for mental health and legal professionals. Several of the writers and webinar presenters made statements about PA theory that were clearly incorrect, i.e., that PA practitioners assume that all children who exhibit contact refusal have been

indoctrinated by the favored parent against the rejected parent. The author attempted to discuss the stated misinformation with the presenters at the webinar, but they simply insisted they knew what they were talking about.

The author thought he had discovered a form of misinformation that presumably had a history and may be widely believed by PA critics. The author investigated that hypothesis by (1) reviewing the writings of known PA critics and working backwards from recent publications to citations to earlier work to identify variations of this misinformation and (2) searching the literature for similar statements made by PA proponents, which would explain the occurrence of misinformation among the PA critics.

Results

By searching the relevant professional literature, an imposing pattern of misinformation was identified regarding parental alienation syndrome (PAS), parental alienation (PA), and PA theory. Indeed, the *same misinformation* regarding PAS/PA was presented in media intended for professional audiences many times over the last 27 years. Specifically, variations of the statement—*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 alienating behaviors by the favored parent.*—were published 40 times between 1994 and 2020. The misinformation appeared in journal articles, book chapters, presentations for professional audiences, a legal brief, and policy statements of professional organizations. Each example is listed in [Table 1](#), including the citation, a quotation of the misinformation, and comments by this author.

It is notable, moreover, that two national professional organizations incorporated misinformation described here into official documents or policies. They are explained here:

The National Council of Juvenile and Family Court Judges

The NCJFCJ published two relevant documents: *Navigating Custody & Visitation Evaluations in Cases with Domestic Violence: A Judge's Guide*, by Dalton, Drozd, and Wong (2006) and *A Judicial Guide to Child Safety in Custody Cases*, by Bowles, Christian, Drew, and Yetter (2008). Both documents made the following false statement regarding PA theory:

The discredited “diagnosis” of PAS (or an allegation of “parental alienation”) ... inappropriately asks the court to *assume* that the child's behaviors and attitudes toward the parent who claims to be “alienated” have no grounding in reality. (emphasis added) (Bowles et al., 2008, p. 13; Dalton et al., 2006, p. 24)

Of course, no PA proponent asks the court to *assume* that the child's contact refusal has no basis in reality. The diagnosis of PA requires a showing of alienating behaviors by the favored parent, signs of PA in the child, and other factors. Neither of these documents generated by the NCJFCJ provided a source for the false information they published regarding PA theory.

The American Professional Society on the Abuse of Children

The APSAC participated in the chain of misinformation regarding PA described in this article, which culminated in a highly flawed policy statement (American Professional Society on the Abuse of Children (APSAC), 2019). That organization released the following "Statement of Caution Regarding Use of APSAC Publications":

It is negligent, even reckless for a judge, attorney, guardian, counselor or other professional to cite or otherwise mischaracterize this or any APSAC publication on psychological maltreatment as endorsing or even lending credence to a diagnosis or finding of "parental alienation." To find that a parent has committed psychological abuse of a child in an effort to interfere with that child's relationship with the other parent requires direct evidence of the parent's behavior such as significant denigration, efforts to undermine the relationship of that child with the other parent, and/or efforts to get the child to make false allegations of abuse or other extremely damaging behavior by the other parent. A child's avoidance of a parent is not sufficient evidence of psychological abuse by either parent. (APSAC, 2019, p. 1)

This strongly worded admonition by APSAC appears to be addressing a nonexistent problem. That is, every PA proponent agrees that it is necessary to identify "direct evidence of the parent's behavior," i.e., alienating behaviors, in order to diagnose PA. The APSAC policy statement provided no reference or any source for wrongly implying that PA proponents say a child's contact refusal is sufficient evidence to conclude the favored parent influenced the child to reject the alienated parent.

Possible sources of misunderstanding

The assemblage of misinformation discussed in this paper did not come out of thin air. It is possible that these recurrent false accounts were prompted by a misunderstanding of statements made in articles or books written by PA proponents. The author searched PA literature to identify not only recurrent misinformation made by PA critics but also similar statements made by PA proponents, which would explain the occurrence of misinformation among the PA critics. Although the author did not identify any article in the PA literature supporting the notion that an

evaluator may make the diagnosis of PA simply based on behavioral signs in the child, there are passages in PA literature which could have been misconstrued to that effect. It is possible that misinformation among critics was prompted by misunderstanding statements made in articles or books written by PA proponents. For example, Gardner wrote:

The diagnosis of the PAS is determined by the symptomatology in the child, not the degree to which the alienator has tried to induce the disorder. There are many situations in which the attempts to program the child into the campaign of denigration have not been successful, even though the alienator has been relentless in the attempts to alienate the child. (Gardner, 2001, p. xx)

Some readers might misunderstand that passage and conclude that PAS may be identified simply based on the eight behavioral signs in the child without any reference to the activities of the favored parent. Of course, that is not what Gardner was trying to communicate, since he stated repeatedly that PAS was caused by the indoctrinating or brainwashing activities of the favored parent in conjunction with the child's own tendency to gravitate to the brainwashing parent and reject the target parent.

Also, there is a chart in a book by Lorandos, Bernet, and Sauber (2013) with the heading, "Criteria for the Diagnosis of Parental Alienation" (p. 17). The chart lists two primary symptoms of PA—campaign of denigration and frivolous rationalizations for the child's criticisms—and six additional common manifestations of PA. A reader with a limited understanding of PA theory might think those eight behavioral symptoms are all it takes to identify or understand PA. However, it is clear from other passages in the same chapter that it is necessary to identify the underlying cause of the problem: "There are several psychosocial pathways to PA. The most common is that the alienating parent indoctrinates the child to dislike and/or fear the target parent" (p. 9).

Although it seemed obvious from the beginning that PAS/PA requires both "factors within the parent that contribute to the child's alienation" and "factors that arise within the child" (Gardner, 1985, p. 3), perhaps that was not clear to everyone who sought to understand this mental condition. This principle was reiterated and made more explicit in the recent book, *Parental Alienation – Science and Law* (Lorandos & Bernet, 2020). The book is structured around the Five-Factor Model for the diagnosis of parental alienation, which includes Factor Four (the use of multiple alienating behaviors on the part of the favored parent) and Factor Five (exhibition of many of the eight behavioral manifestations of alienation by the child) (Bernet, 2020c). In the same book, Baker explicitly wrote:

At its core, PA theory posits that some children who reject a parent do so because they have been manipulated by the other parent to hold false and distorted thoughts

and feelings about that parent. Integral to this theory is the understanding that not all children who reject a parent are alienated, that is, have been exposed to alienating behaviors (ABs) on the part of the favored parent that foster their unjustified rejection of the other parent. ... Nowhere is it written in any legitimate treatise that all rejecting children are alienated. (Baker, 2020, p. 208)

Discussion

This article reports empirical research that documents a pattern of recurrent false statements in the literature of psychiatry, psychology, and law. Although several of the false statements discussed here were formerly identified as misinformation, the *pattern* of these statements—in the form of a woozle or scholarly rumor—was not previously recognized. In many instances, an author simply copied erroneous information from the writings of an earlier author. It is notable that a small number of writers created a disproportionate number of examples of published misinformation and a single journal published a disproportionate number of misleading articles. This research suggests that a systemic flaw has occurred among the authors, editors, peer reviewers, and publishers of mental health and legal literature; each of these individuals contributed in their own way to this pattern of misinformation.

While the recurrent misinformation discussed in this article may have been prompted by misreading and misunderstanding statements such as Gardner (2001) and Lorandos et al. (2013), there must have been additional factors that kept this woozle going for 27 years. It seems likely that PA critics have had negative preconceptions regarding this topic (e.g., “PA theory is deeply flawed.”), which leads them to misinterpret a central principle of PA theory (e.g., “PA proponents *assume* all children who reject Parent B were indoctrinated by Parent A.”). Indeed, bias is an important consideration among forensic practitioners. Dror et al. (2021) wrote, “Cognitive bias in forensic science decisions has led to erroneous conclusions with devastating consequences ...” (pp. 1–2). There is no way to know what has been going on in the minds of PA critics cited in this article without engaging in open and honest conversations with them. However, it is well known that some PA critics strive to invalidate PA theory because of their concerns that the concept of PA makes it easier for abusive parents to escape responsibility for their abuse.

Conclusions

Since the 1990s, recurrent misinformation regarding PA theory has been published repeatedly in journals intended for mental health and legal

practitioners. This trail of recurrent misinformation is not trivial; it is a significant misrepresentation of basic tenets of PA theory. Several patterns can be observed in the data collected during this research:

1. A form of the words *assume*, *presume*, or *infer* occurred in 24 of the 40 examples of misinformation cited here. PA critics have the persistent notion that PA proponents jump to the diagnosis of PA with minimal or inadequate information. Certainly, PA proponents do not suggest that approach in the numerous articles, chapters, and books published regarding PA theory and assessment procedures.
2. In most of the examples discussed here, the authors provided no citation at all for the false statements. When citations were provided, they did not support the assertions made in the false statements. While all the examples cited in this article have been described as misinformation, it is possible that some of them constitute disinformation. *Misinformation* refers to false information that is spread, regardless of the author's intent to mislead the reader; it is a generic term for any kind of wrong or false information. *Disinformation*, on the other hand, refers to material that is deliberately misleading or biased. Thus, disinformation is spreading misinformation in a knowing and purposeful manner.
3. In [Table 1](#), there are several examples of “scholarly rumors” (Johnston, 2007), in which misinformation from Author A is cited by Author B, who is then cited by Author C. For example, Dalton et al. (2006) cited Bruch (2001) to support their false statement regarding PA theory. Also, Silberg and Dallam (2019) cited Mercer (2019a), who cited Huff (2015), who had erroneously relied on Gardner (1999b, 2004a), all to the effect that a child's contact refusal may be used to diagnose the presence of alienating behaviors by the parent.
4. The frequency of published misinformation appears to have increased dramatically in recent years (See [Figure 1](#)). This increase is probably associated with more robust discussion regarding this topic; e.g., the *Journal of Child Custody*, the *APSAC Advisor*, and the *Family Court Review* published special issues regarding PA in 2019 and 2020. However, this phenomenon over time could have resulted simply from an inadvertent bias in searching for and locating examples of this misinformation.
5. There is a pattern in the authorship of the articles. That is, Robert Geffner, Joan S. Meier, and Jean Mercer were each represented in four or more of the cited examples of misinformation.

6. Finally, there is a pattern involving the journals where the misinformation was published. Of the 40 instances of misinformation cited in this article, seven of them were published in the *Journal of Child Custody* (now called the *Journal of Family Trauma, Child Custody, and Child Development*) between 2009 and 2020. Furthermore, several of the authors cited in this article are on the Editorial Board of that journal: Robert Geffner (Editor-in-Chief), Morgan Shaw (Co-Editor), Connie Beck (Associate Editor), Madelyn Milchman (Associate Editor), Jean Mercer, Linda C. Neilson, Joyanna L. Silberg, and G. Andrew H. Benjamin (until 2019).

In the far-reaching scope of PA scholarship, a high level of partisanship has occurred. This extreme polarization has damaged the credibility of legitimate researchers and practitioners. It has delayed the type of study and collaboration that would help us reach valid conclusions regarding this important topic. In fact, a major limitation of the research published here is that it presents one side—the perspective of a PA proponent—of a complicated field of study. Ideally, this type of literature review would be a joint effort of proponents and critics. It will be important for PA proponents and PA critics to communicate with each other and share proposals and hypotheses; the recent Special Issue of *Family Court Review* (2020, volume 58, number 2) was a step in that direction. If only they would talk with each other, it seems likely proponents and critics would find they agree on many aspects of parental alienation. For example, both proponents and critics are concerned about domestic violence; all of us

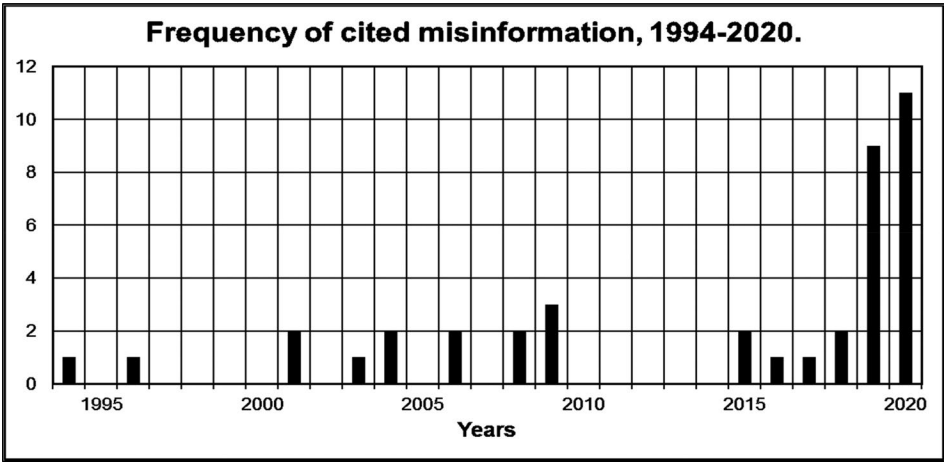


Figure 1. Frequency of cited misinformation, 1994–2020. Forty articles, documents, and presentations were identified with the same misinformation regarding parental alienation theory, published between 1994 and 2020. A large increase in the frequency of published misinformation occurred during 2019 and 2020.

want to protect children from maltreatment. Furthermore, by discussing and debating their disagreements, proponents and critics may be able to devise research projects that will sort out their differences and discover ground truth.

Implications for family therapy/practice

The recognition of PA, prevention of incipient PA, and interventions for more established PA are important skills for contemporary family therapists. PA occurs in approximately 20 percent of high-conflict separations and divorces (Bernet 2020a, pp. 19–20). Family therapists have occasion to meet these families and work with them before, during, and after their divorces. It is essential for family therapists to understand PA theory in order to correctly identify the underlying reasons why contact refusal or resist/refuse dynamics occur in those high-conflict divorces. While there is an abundant literature regarding PA available to family therapists (e.g., Gottlieb, 2012; Johnston et al., 2001), there is also an unusual amount of misinformation regarding PA that corrupts journal articles and book chapters. This article should help practitioners distinguish true PA theory from mistaken or misleading versions that are found in professional writings.

Directions for future research

This article explains how the same, recurrent misinformation was published 40 times in journals and books over 27 years. The methodology employed here was to start with contemporary instances of misinformation and work backwards by reviewing the references for earlier examples of the same misinformation. It will be equally important to start with the earliest known example of this misinformation (Wood, 1994) and work forward to find and review articles that cite Wood, and then find and review articles that cite those later articles; it should be possible to create a genealogy of the same misinformation from 1994 to the present time.

In addition to the misinformation discussed in this article, there are numerous other false statements regarding PA that occur in the professional literature read by family therapists (Bernet 2020b). It will be important to know whether these false notions have entered the knowledge base of practicing family therapists. In a future project, researchers could invite family therapists and other mental health professionals to distinguish true from false statements regarding PA theory. The results would have a direct bearing on the training and continuing education provided to family therapists.

The ideal future research will involve the collaboration of PA proponents and PA critics. Specific topics for such research include: searching for consensus regarding the definitions of PA, parental estrangement, contact refusal, resist/refuse dynamic, etc.; finding ways to determine the prevalence of mild, moderate, and severe levels of PA; developing criteria for distinguishing PA from estrangement and other reasons for contact refusal; and defining appropriate interventions for mild, moderate, and severe cases of PA.

Action items

1. During this research, the author identified 40 examples of the *same misinformation* by PA critics, i.e., that PA proponents make the error of assuming the favored parent has caused PA in the child simply because the child refuses to visit or have a relationship with the rejected parent, without identifying alienating behaviors by the favored parent. *Action Item:* It is possible the recurrent misinformation described here was based on expositions of PA theory written by PA proponents, which were misunderstood by PA critics. Perhaps there is some logical explanation for this 27-year-old woozle; if so, this author invites professional dialogue. If any of the individuals cited in this article has a good reason for this persistent misunderstanding, they will hopefully inform this author.
2. Some of the PA critics wrote that PA proponents made erroneous statements in evaluations (Lee & Olesen, 2001) or testimony (Silberg & Dallam, 2019); so far, however, no PA critic has provided a specific example of that happening. *Action Item:* If it is determined that PA proponents have created evaluations or testified erroneously along the lines discussed in this article, those individuals should be contacted and advised to improve their understanding of PA theory.
3. Most likely, the best way to diminish the problematic polarization occurring in this field of study is to search for common ground. For example, PA advocates and PA critics could team up to write journal articles together on some aspect of this topic. *Action Item:* A professional organization such as the American Academy of Forensic Sciences, the American Psychological Association, or the Association of Family and Conciliation Courts should convene a workshop of proponents and critics, which has the explicit assignment of developing a project together.
4. The recurrent misinformation described in this article is not just a typographical error involving grammar or punctuation. Rather, this

misinformation has repeatedly and directly contradicted central tenets of PA theory. It is unknown whether PA critics have knowingly repeated this misinformation for some malign purpose or if they are simply ignorant of the principles of PA theory, which they have chosen to write about. *Action Item:* These false statements should be corrected by the authors, their editors, and/or the journal publishers. The correction could take the form of a published announcement (linked to the online version of the article) and/or withdrawing the incorrect article from publication. Authors, editors, and publishers should be alert for this error and proactive in preventing its proliferation. Unless this chain of misinformation is interrupted, it will continue to grow.

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Table 1. Between 1994 and 2020, the *same misinformation* regarding parental alienation theory was published 40 times in journal articles, book chapters, professional presentations, a legal brief, and policy statements of professional organizations.

Citation and Published Misinformation	Comment
(1) Cheri Wood (1994). "In short, the psychological stressors resulting from divorce demonstrate that children's ill feelings toward either parent are often a natural part of the dissolution process. The list of explanations—which is illustrative rather than exhaustive—that provides reasons for children having such feelings furnishes some credible alternatives to the PAS theory that when the children have ill feelings toward their fathers, <i>their mother must be the cause</i> " (emphasis added) (p. 1390).	- There has never been a principle of PAS theory "that when the children have ill feelings toward their fathers, their mother must be the cause." Wood provided no source for that statement.
(2) Danielle Isman (1996). "According to Gardner, PAS manifests in children who unjustly deprecate or criticize a parent. In other words, Gardner believes that <i>whenever</i> a child expresses dislike of or apprehension about contact with the father, and the mother is the primary care-taker, the reason for the child's reservations about the father are caused by the mother's abuse" (emphasis added) (p. 13).	- Isman did not cite any source in Gardner's writings or anywhere else for this false statement, although she did cite Wood (1994) elsewhere in her article.
(3) S. Margaret Lee and Nancy W. Olesen (2001). "There are a number of problems associated with the evaluations that involve questions of alienation. Many evaluations lack depth and completeness and stop at the simplistic finding of "parental alienation syndrome" (PAS) as described by Gardner (1987). That is, one parent is identified as engaging in alienating behavior and/or the child is resisting visits. This conclusion <i>infers</i> causality and leads to a set intervention strategy. In the most disturbing situations of PAS, it is reasoned that when one determines that a child is alienated, it follows that a parent is engaged in brainwashing" (p. 283).	- Although Lee and Olesen cited Gardner (1987), there is no statement in that book to the effect that it is acceptable to reason "that when one determines that a child is alienated, it follows that a parent is engaged in brainwashing."
(4) Carol S. Bruch (2001). "PAS shifts attention away from the perhaps dangerous behavior of the parent seeking custody to that of the custodial parent. This person, who may be attempting to protect the child, is instead <i>presumed</i> to be lying and poisoning the child" (emphasis added) (p. 532).	- Bruch provided no citation or other evidence for the suggestion that PA proponents presume that contact refusal is caused by alienating behaviors of the favored parent.
(5) Elspeth McInnes (2003). "PAS begins from the premise that children who allege serious abuse by a parent are lying and that they are made to lie by an apparently protective parent. ... Children's complaints of harm by a parent are, within the logic of PAS, proof that the child is subject to PAS of by the other parent" (p. 4).	- There is no such premise within PAS/PA theory. McInnes offered no citation for this incorrect statement.
(6) Paula J. Caplan (2004). "A parent who refuses to force the children to visit their father (even when an abuse allegation is still being investigated) or does not "cooperate" with a court-ordered assessment is <i>assumed</i> to be involved in PAS rather than possibly perceiving accurately or even reasonably believing that the father or assessor may be biased against her child" (emphasis added) (p. 63).	- Caplan said that in cases of contact refusal (in which children are not visiting their father), the evaluator assumes that the mother is alienating the children without considering other possibilities. Caplan provided no source for that false statement.
(7) G. Kim Blank and Tara Ney (2006). "The child's story ... is <i>always</i> , according to Gardner, the product of brainwashing on the part of the parents" (emphasis in original) (p. 141). "Thus, in this area of high-conflict divorce involving non-visitation of a child, we see entrenched and polarized perspectives of power based on a specialized, privileged knowledge. On one hand, there 'are those who deny the possibility that any child could develop an irrational alienation from a parent,' and on the other, those, like Gardner, who hold that a parent is always to blame" (p. 146).	- Blank and Ney misinterpreted Gardner. Gardner (1982, p. 175) simply said that it is very common for parents to try to influence their children in the context of custody litigation. He did not say that all children are duly influenced; he did not say that contact refusal is always caused by the preferred parent.

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Table 1. Continued.

Citation and Published Misinformation	Comment
(8) Jennifer Hoult (2006) . "By diagnosing PAS solely on the basis of the child's symptoms, the DDC tautologically <i>presumes</i> pathology, parental contribution, and lack of justification, the very factors that Gardner claimed distinguish PAS from other forms of [contact refusal]" (emphasis added) (p. 9).	- When Hoult cited "DDC," she was referring "differential diagnosis criteria" Gardner (2004a). Nothing in that article suggests that Gardner thought PAS could be diagnosed "solely on the basis of the child's symptoms" or that an evaluator should "presume pathology, parental contribution, and lack of justification."
(9) Clare Dalton, Leslie M. Drozd, and Frances Q. F. Wong (2006) . "The discredited 'diagnosis' of PAS (or an allegation of 'parental alienation') ... inappropriately asks the court to <i>assume</i> that the child's behaviors and attitudes toward the parent who claims to be 'alienated' have no grounding in reality" (emphasis added) (p. 24).	- Both documents published by the National Council of Juvenile and Family Court Judges made the same false statement regarding PA theory. Of course, no PA proponent asks the court to assume that the child's contact refusal has no basis in reality. The diagnosis of PA requires a showing of alienating behaviors by the preferred parent, symptoms of PA in the child, and other factors. Dalton et al. cited Bruch (2001) to support their false statement regarding PA theory.
(10) Jerry J. Bowles, Kaye K. Christian, Margaret B. Drew, and Katheryn L. Yetter (2008) . "The discredited 'diagnosis' of PAS (or an allegation of 'parental alienation') ... inappropriately asks the court to <i>assume</i> that the child's behaviors and attitudes toward the parent who claims to be "alienated" have no grounding in reality" (emphasis added) (p. 13).	
(11) Andraé L. Brown (2008) . "Unfortunately, the intentionally vague and undefined diagnostic criteria for PAS shift the focus from the abusing parent to the child. A frame is set in which all negative statements made by children about the noncustodial parent become evidence of alienation by the custodial parent" (p. 388).	- Brown cited no source for the false notion that PAS theory holds that "all negative statements made by children" about one parent are evidence of alienating behaviors by the other parent.
(12) Leslie M. Drozd (2009) . "Parental alienation syndrome refers to a purported pattern of signs and symptoms occurring in the child that indicate the presence of alienating behavior in a parent that has resulted in the child's alienation from the other parent" (p. 404). "Gardner claimed that the presence of several elements of this supposed syndrome indicated that the child had been induced to hate the alienated parent by the activities of the supposed alienating parent ..." (p. 405).	- Neither Gardner nor subsequent PA proponents ever said that a child's contact refusal is always caused by the alienating behaviors of the preferred parent. Drozd provided no reference in Gardner's writings to support that claim.
(13) Joan S. Meier (2009) . "It is this kind of circularity and conclusory reasoning that gives weight to the common accusation that PAS theory simply <i>presumes</i> that a child's hostility toward a father is pathological and that mothers who make such allegations are doing so only to undermine the child's relationship with the father" (emphasis in original) (p. 236).	- Meier provided no source for the presumption "that a child's hostility toward a father is pathological," caused by the alienating behaviors of the mother. Meier was correct that it was a "common accusation" that PAS theory made that presumption, but that notion cannot be found in the writings of Gardner or any other PA proponent. That presumption is only found in the writings of PA critics.
(14) Amy Neustein and Michael Leshner (2009) . "Yet the assumption of a reliable correlation between a child's fear and dislike of his father and a 'campaign of denigration' by the child's mother was the heart and soul of Gardner's PAS theory" (emphasis added) (p. 323).	- PAS theory never stated that a "campaign of denigration" by the mother could be assumed simply because a child expressed dislike of his father. Neustein and Leshner provided no reference for that claim.

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Citation and Published Misinformation	Comment
<p>(15) Miguel Clemente and Dolores Padilla-Racero (2015). “The term ‘campaign of denigration’ (Gardner, 1998, 1999a), <i>assumes</i> that the child is lying. And this is one of the main problems with this purported syndrome—its point of departure is the idea that children do not tell the truth because they are manipulated. Thus, if a child states that she does not want to see her father, this is explained as fruit of the mother’s manipulation, and the mother would be accused of being a manipulative mother. However, the hypothesis that the child is being physically or even sexually abused by her father is not contemplated and therefore not investigated” (emphasis added) (p. 102).</p>	<p>- Nothing in that paragraph can be found in the two citations to Gardner (1998, 1999a). Gardner’s concept of the “campaign of denigration” does not assume that the child is lying. It is not automatically concluded that a child’s contact refusal is caused by the “fruit of mother’s manipulation.” It is incorrect to say that PA proponents do not consider and investigate alternative hypotheses for a child’s contact refusal.</p>
<p>(16) Scott C. Huff (2015). “Gardner (1999b, 2004a), for example, uses child behaviors of contact refusal to diagnose the presence of severe alienating behavior by the parent” (p. 72).</p>	<p>- Huff was mistaken in citing Gardner (1999b, 2004a). Neither of those articles had anything to do with “[using] child behaviors of contact refusal to diagnose the presence of severe alienating behavior by the parent.” Huff may have been relying on Meier (2009), since that article was included in his references.</p>
<p>(17) William O’Donohue, Lorraine T. Benuto, and Natalie Bennett (2016). “Absent any scientific data at all, Gardener [sic] advanced the claim that when there is an alienating parent, a child will, fairly inevitably, develop a series of problematic behaviors and/or reactions. He also claimed that the reverse <i>inference</i> was valid; specifically, that clinicians could conclude that there is an alienating parent when they observed children exhibiting certain behaviors” (emphasis added) (p. 114).</p>	<p>- Both sentences are incorrect. PA advocates say that contact refusal is sometimes caused by the preferred parent’s alienating behaviors, but it may also have other causes. O’Donohue et al. provided no citation to Gardner or anyone else for these erroneous statements.</p>
<p>(18) Madelyn S. Milchman (2017). Milchman analyzed 24 published child custody cases from New York that involved allegations of parental alienation and/or child sexual abuse. In eight of the 20 father custody cases, “there was also affirmative evidence of PA.” In the other 12 father custody cases, “there was no affirmative evidence of PA” (p. 237). Milchman explained: “In the other 12 father custody cases with unfounded CSA allegations, there was no affirmative evidence of PA. The only PA evidence was the unfounded CSA allegations, which were interpreted as deliberate and malicious. ... The equation of an unfounded CSA allegation with PA in the absence of direct evidence for PA is a dangerous equation ...” (p. 237).</p>	<p>- PA was not a factor in any of the “other 12 father custody cases”: the topic of PA was not introduced by the fathers, their attorneys, the expert witnesses, or the court. Milchman imposed her own misconceptions regarding PA theory on the New York family law cases. She thought that making a false CSA allegation was equivalent to claiming PA, but they are not the same: many false CSA allegations have nothing to do with PA (as occurred in the 12 family law cases discussed by Milchman); many PA cases have nothing to do with false CSA allegations; and occasionally PA and false CSA allegations occur together.</p>
<p>(19) Suzanne Zaccour (2018). “Both leading models of PA(S) rely on the child: Gardner diagnoses PAS based on eight symptoms found in the child and <i>assumes</i> the alienating parent’s responsibility ...” (emphasis added) (p. 1097).</p>	<p>- Neither Gardner nor PA proponents have made that assumption. Zaccour did not cite any resource for that incorrect statement.</p>
<p>(20) Linda C. Neilson (2018). Neilson discussed how claims of parental alienation affect evidence in family law cases in Canadian courts. She said: “Let us turn now to other assertions of parental alienation advocates testifying in Canadian cases to see how the assertions, if accepted by courts, would affect judicial fact finding and analysis of evidence. Parental alienation advocates advise courts to <i>assume</i> the presence of parental alienation when children resist contact with non-primary-care parents” (emphasis added) (p. 29).</p>	<p>- PA advocates do not assume the diagnosis of PA simply because children resist contact with a parent. In support of that misstatement, Neilson provided quotations from five trial and appellate cases from Canada. However, none of the cited cases involved a PA advocate’s advising the court or testifying to the effect that the court should assume the presence of PA whenever children manifest contact refusal.</p>

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Citation and Published Misinformation	Comment
(21) G. Andrew H. Benjamin, Connie J. Beck, Morgan Shaw, and Robert Geffner (2019). “[PAS] assumes that a child’s strong alignment with one parent while rejecting a relationship with the other parent is without legitimate justification ...” (emphasis added) (p. 34).	- PA theory does not assume that a child’s contact refusal is without legitimate justification. Every PA proponent knows that PA is one possible explanation for a child’s contact refusal, but not the only possibility.
(22) Jean Mercer (2019a). “PA proponents have been guilty of circular reasoning since Gardner’s day (cf. Huff, 2015) in that they have omitted the collection of data about one parent’s persuasive efforts but have nevertheless <i>assumed</i> that [visitation resistance or refusal] (without “justified” causes like physical abuse) is in itself evidence that the preferred parent has carried out a campaign of denigration against the nonpreferred parent” (emphasis added) (p. 95).	- Mercer was relying on Huff (2015), who made a similar argument without any basis in the literature. Mercer provided no evidence for the claim that PA proponents assume that contact refusal “is in itself evidence that the preferred parent has carried out a campaign of denigration”
(23) Jean Mercer (2019b). “Gardner proposed that child or adolescent [visitation reluctance or refusal] should be identified as PA, and thus the result of the preferred parent’s actions, when certain criteria were met” (p. 352–353). “It is notable that the first criterion item, a campaign of denigration [by the preferred parent] is usually <i>assumed</i> rather than demonstrated” (emphasis added) (p. 353). “It is an error of logic to <i>assume</i> that when a child avoids a non-preferred parent, the preferred parent must have persuaded the child to do so. This fallacious <i>assumption</i> is a common error of critical reasoning called affirming the consequent, in which it is wrongly thought that if B follows A, B must always have been preceded by A, even though B might also (or instead) have been preceded by C, D, etc.” (emphases added) (p. 358).	- The two articles by Mercer (2019a, 2019b) stated the same error, i.e., claiming that PA proponents assume that all contact refusal is caused by the preferred parent’s alienating behaviors without considering other possible explanations. Mercer provided no source for that misinformation.
(24) Kimberley J. Joyce (2019). “From Gardner’s (1987) notion of PAS theory comes the critical relationship of cause and effect. PAS encapsulates a theory that the occurrence of certain ‘typical’ manifestations in a child has the common cause of a favored parent’s conscious or unconscious ‘brainwashing’” (p. 65). “It is a disorder that excludes other factors that might impact the parent–child relationship, and attributes responsibility exclusively to the favored parent. <i>This</i> is the underlying structure of the theory: a <i>backwards-looking</i> theory of cause and effect (i.e., when you see the effect, you can look backwards and infer the cause) that has not changed over the more than thirty years since Gardner’s (1987) book was first published” (emphases in original) (p. 66).	- There is no text in Gardner (1987) consistent with Joyce’s opinion that PAS theory requires that B (“manifestations in a child”) must have been preceded by A (parental “brainwashing”). PA proponents say that manifestations of PA in the child, such as contact refusal, might have been caused by parental brainwashing, but may have been caused by other factors.
(25) Joan S. Meier and Sasha Drobnick (2019). “Parental alienation ... generally refers to the <i>presumption</i> that a child’s fear or rejection of one parent ... stems from the malevolent influence of the preferred ... parent. The alienation hypothesis inherently relies on two <i>flawed assumptions</i> : (i) that children do not ordinarily fear or resist a non-custodial parent without manipulation by the other parent; and (ii) that a child’s hostility toward or fear of the other parent can, in fact, be caused solely by the favored parent’s negative influence ..., regardless of the child’s own experience” (emphases added) (pp. 2–3).	- Those misstatements appeared in an amicus brief filed in a child custody dispute at the New York Court of Appeals. Meier and Drobnick provided no source or evidence for those statements.
(26) Linda C. Neilson and Joan Meier (2019). “Empirically verified problems associated with the application of parental alienation theory ... include: ... Deflection of attention from scrutiny of parenting practices and parent–child relationships in favor of <i>assuming</i> primary-care parent blame when children have poor relationships with the other parent” (emphasis added).	- These authors asserted that PA proponents simply assume that the acts of the preferred parent are the reason for a child’s problematic relationship with the rejected parent. They provided no reference or any other basis for that statement.

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Citation and Published Misinformation	Comment
<p>(27) Joan S. Meier, Sean Dickson, Chris O'Sullivan, Leora Rosen, and Jeffrey Hayes (2019). "Parental alienation ... is the theory that when a mother and/or child seek to restrict a father's access to the child, their claims of dangerousness or harm are not true, but due to the mother's anger or hostility, or pathology" (p. 4).</p>	<p>- Meier et al. assert that a child's contact refusal automatically means that the mother caused it through false claims of dangerousness, without any further investigation. Meier et al. provided no source or citation within PA literature to that effect. This research in Meier et al. (2019) was also reported in Meier (2020).</p>
<p>(28) Joyanna Silberg and Stephanie Dallam (2019). Silberg and Dallam explained their study of overturned decisions, i.e., cases in which a court reversed an earlier court's decision regarding a child's custody. They said: "Our findings offer support to those who have noted that more recent theories of parental alienation do not present a significant improvement over Gardner's original conceptualization of PAS (Houchin et al., 2012; Meier, 2013). For example, the various parental alienation theories utilized by professionals evaluating the children in our dataset all included the logical error of affirming the consequent (see Mercer (in press), this issue), as there had been no documentation of the mothers attempting to brainwash their children against their father. Similarly, no supporting evidence for maternal coaching was presented in any of the cases we studied" (p. 160).</p>	<p>- The allegation by Silberg and Dallam regarding "the logical error of affirming the consequent" relied on Mercer (2019a), who relied on Huff (2015), who had erroneously cited Gardner (1999b, 2004a). Silberg and Dallam said they identified ten "turned around" cases, which involved allegations of PA that were used to counteract allegations of child abuse. Thus, it is possible that some custody evaluators are making the error of "affirming the consequent" and testifying to that effect. This author contacted Silberg and asked for more specific information about the ten problematic cases; Silberg did not respond to that request.</p>
<p>(29) American Professional Society on the Abuse of Children (2019). APSAC published the following "Statement of Caution Regarding Use of APSAC Publications": "It is negligent, even reckless for a judge, attorney, guardian, counselor or other professional to cite or otherwise mischaracterize this or any APSAC publication on psychological maltreatment as endorsing or even lending credence to a diagnosis or finding of 'parental alienation.' To find that a parent has committed psychological abuse of a child in an effort to interfere with that child's relationship with the other parent requires direct evidence of the parent's behavior such as significant denigration, efforts to undermine the relationship of that child with the other parent, and/or efforts to get the child to make false allegations of abuse or other extremely damaging behavior by the other parent. A child's avoidance of a parent is not sufficient evidence of psychological abuse by either parent" (p. 1).</p>	<p>- The chain of misinformation regarding PA—described in this paper—culminated in a highly flawed policy statement published by APSAC. This strongly worded admonition appears to be addressing a nonexistent problem. Every PA proponent agrees that it is necessary to identify "direct evidence of the parent's behavior," i.e., alienating behaviors, in order to diagnose PA. The authors of the APSAC policy statement did not provide any citation from PA literature to the effect that PA can be diagnosed simply on the basis of "a child's avoidance of a parent."</p>
<p>(30) Joan S. Meier (2020). "Parental alienation, while lacking any universal definition, embodies the notion that when a child (or the primary parent) resists contact with the non-custodial parent without 'legitimate' reason, the preferred parent is 'alienating' the child, due to her own anger, hostility or pathology" (Johnston and Kelly 2004, Zaccour 2018) (p. 92).</p>	<p>- Meier cited Johnston and Kelly (2004), who in turn cited Gardner (2004b). However, Gardner never said that an evaluator should assume the presence of an alienating parent simply because the child manifests behaviors that are typical of PAS. Meier correctly cited Zaccour (2018), who made the same error in her article about custody cases in Quebec, Canada.</p>

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Table 1. Continued.

Citation and Published Misinformation	Comment
<p>(31) Workgroup to Study Child Custody Court Proceedings Involving Child Abuse or Domestic Violence Allegations (2020). This document was prepared for the governor and legislative leaders of Maryland. The Workgroup heard testimony from Joan Meier, who said: “While there is no universal definition for parental alienation, it typically refers to a belief that a child’s behaviors, such as a fear or hostility, toward one parent are due to the malicious influence of the other parent. ... Put simply, it is not appropriate for courts to rely on parental alienation as a conclusive reason for a child’s negative attitude toward a parent. Instead, courts must realize that a child may have his or her own legitimate reasons to demonstrate fear or rejection of a parent...” (p. 9).</p>	<p>- Meier has consistently stated the same misinformation regarding PA theory, i.e., that PA proponents automatically conclude that a child’s contact refusal is caused by alienating behaviors of the favored parent. Meier provided no source for that false information.</p>
<p>(32) Robert Geffner and Aileen Herlinda Sandoval (2020). “The concept of PA, when accurately used, <i>assumes</i> a parent is intentionally attempting to turn a child against the other parent through concerted efforts of verbally denigrating the other parent or acting in other ways to accomplish this goal” (emphasis added) (p. 28).</p>	<p>- Geffner and Sandoval provided no citation or other evidence for the suggestion that PA theory assumes that a parent is intentionally engaging in alienating behaviors to cause the child to turn against the other parent.</p>
<p>(33) Aileen Herlinda Sandoval and Robert Geffner (2020). Different constructs and labels have been used to discuss a child rejecting contact with a parent, and PAS/PAS/PA proponents <i>assume</i> that there is no justification for this refusal and negative reaction by the child so therefore it must be due to alienation” (emphasis added) (p. 38).</p>	<p>- Sandoval and Geffner provided no citation or other evidence for the statement that PA proponents assume that contact refusal is caused by alienating behaviors of the preferred parent.</p>
<p>(34) Janet R. Johnston and Matthew J. Sullivan (2020). Johnston and Sullivan listed “Common Erroneous Assumptions Deriving from the Single Factor Model” (emphasis added). One of the erroneous assumptions in their list was: “If a parentally alienated child exists, then the preferred parent’s alienating behavior must exist and is fueling the child’s alienation” (p. 278).</p>	<p>- Johnston and Sullivan provided no citation from PA literature for the “erroneous assumption” that “if a parentally alienated child exists, then the preferred parent’s alienating behavior must exist”</p>
<p>(35) Madelyn S. Milchman, Robert Geffner, and Joan S. Meier (2020). “Sadly, child custody evaluators make frequent errors in weighing abuse and alienation evidence and in interpreting protective behaviors Such errors also are frequently made by those who are predisposed to <i>assume</i> that improper PAS/PAD/PA by the child’s preferred parent is the explanation for a child’s rejection or resistance to the other parent” (emphasis added) (pp. 341–342).</p>	<p>- No PA proponent suggests that evaluators should assume that the preferred parent’s activities are the reason for the child’s contact refusal. Milchman et al. provided no source for that misinformation.</p>
<p>(36) Jean Mercer (2020a). “[Parental Alienation Belief System] supporters assert that child avoidant behavior is evidence that psychological harm has occurred” (slide 3). “Examining the Claim that Child Avoidant Behavior is Evidence of Previous and Ongoing Psychological Harm. N.B. this is the most important of all PABS claims, as it provides the rationale for custody change and prohibition of contact between the child and the preferred parent ...” (slide 4). “The preferred parent is thus categorized as an abuser, even if that person’s actions are only <i>inferred</i> from child avoidant behavior” (emphasis added) (slide 6).</p>	<p>- During one Zoom presentation to members of the American Professional Society on the Abuse of Children (APSAC), Mercer repeatedly stated misinformation, i.e., that PA proponents assume or infer that the preferred parent has manifested alienating behaviors simply based on contact refusal behaviors in the child. Mercer provided no citation or other evidence that this belief has been stated or endorsed anywhere in articles, chapters, or books written by PA proponents.</p>

(Continued)

Table 1. Continued.

Citation and Published Misinformation	Comment
(37) Thelma Moreira Marques, Isabel Narciso, and Luana Cunha Ferreira (2020). “As Mercer (2019a) recently pointed out, there is an error of logic in the <i>assumption</i> that the child’s resistance or contact refusal is always the result of the manipulation or persuasion of the preferred parent, who influences the child to avoid the nonpreferred parent” (emphasis added) (p. 8).	- There is no such assumption in the world literature regarding PA. These authors cited Mercer (2019a), who discussed the logical error of assuming the consequent and wrongly attributed that error to PA proponents.
(38) Lenore E. A. Walker (2020). “Sadly, the data with which alienation claims are proven is slim to none in most of these cases, with mothers losing custody twice as much as fathers” (p. 1756).	- Walker is claiming that the diagnosis of PA is made with neither evidence of contact refusal nor evidence of alienating behaviors. The article she was discussing—Meier et al. (2019)—does not make that statement.
(39) Adrienne Barnett (2020). This document was distributed to members of the British Parliament regarding important legislation that was under consideration. Barnett explained the history of PAS and wrote: “Subsequently, PAS was extended to include cases of all types in which a child refused to visit the noncustodial parent (Bruch, 2001).”	- That is a false statement regarding PA/PAS theory. Bruch’s paper (2001) made a similar false statement regarding PA/PAS theory.
(40) Jean Mercer (2021). “The ideas behind PA are implausible for a variety of reasons, but an essential issue has to do with the use of <i>inference</i> rather than direct observation (Milchman et al., 2020). A child’s rejection of one parent is <i>inferred</i> to mean that the preferred parent has acted to alienate the child, and this <i>assumption</i> is made without evidence that such actions occurred except possibly for statements offered by the rejected parent” (emphases added) (p. 203). “As long as PA is simply <i>inferred</i> from the single fact of a child avoiding a parent, there can be no meaningful evidence about the existence or nature of the PA phenomenon” (emphasis added) (p. 208).	- Mercer provided no source for the repeated false statements that PA advocates make the diagnosis of PA simply on the basis of a child’s contact refusal. There is no such assumption or inference in the world literature regarding PA that has been published since 1985. Mercer cited Milchman et al. (2020), who made the same error.

The items in this table are in chronological order. PA=parental alienation. PAS=parental alienation syndrome.