

Father? What Father?¹

Parental Alienation and Its Effect on Children

By Chaim Steinberger

Part One

Preface

There is no doubt that every child needs "frequent and regular" contact with both parents to develop in a psychologically healthy manner.² A custodial parent is, therefore, obligated by law to ensure the continued relationship between the child and the non-custodial parent.³ The Appellate Division, Second Department, explained why frequent contact is needed between them:

Only [with frequent contact] may a non-custodial parent provide his child with the guidance and counsel youngsters require in their formative years. Only then may he be an available source of comfort and solace in times of his child's need. Only then may he share in the joy of watching his offspring grow to maturity and adulthood. . . . Indeed, so jealously do the courts guard the relationship between a non-custodial parent and his child that any interference with it by the custodial parent has been said to be "an act so inconsistent with the best interests of the children as to, per se, raise a strong probability that the [offending party] is unfit to act as custodial parent."

. . . The decision to bear children, [moreover], entails serious obligations and among them is the duty to protect the child's relationship with both parents even in the event of a divorce. Hence, a custodial parent may be properly called upon to make certain sacrifices to ensure the right of the child to the benefits of visitation with the non-custodial parent. The search, therefore, is for a reasonable accommodation of the rights and needs of all concerned, with appropriate consideration given to the good faith of the parties in respecting each other's parental rights.⁴

Nevertheless, a twelve-year study commissioned by the Family Law Section of the American Bar Association of over 1,000 divorces found that "parental alienation," the programming of a child against the other parent,

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New York courts have in the past "zealously protected" the non-custodial parent's visitation rights against interference by the custodial parent.⁶ Custodial parents seeking to exclude the other parent have, therefore, taken to socially and psychologically turning the child away from the other parent so that the child, and not the custodial parent, refuses the visitation. This type of "alienation" has been characterized by the Second Department as a "subtle and insidious" form of visitation interference that may cause even "greater and more permanent damage to the emotional psyche of a child" than the garden variety visitation interference.⁷

This article will summarize the leading literature in the field of alienation. Part One will review the different techniques employed by alienating parents to marginalize and exclude the other parent from their children's lives. It will set out the most common symptoms of alienation so that the reader will be more attuned to recognize and deal with potential alienation, and counsel clients who are effected by it. Finally, it will describe the profound and enduring devastating psychological, emotional and social consequences alienation has on its primary victims—the children.

Part Two of the article will appear in a subsequent issue and describe the effective treatments for alienation, and how New York courts have traditionally and recently dealt with the issue. Because alienation has such profound inter-generational consequences, judges and lawyers must be ever-vigilant to detect and deal with alienation, no matter the guise by which it is concealed.

Parental Alienation

Parental alienation is the turning of a child against a parent by the other parent.⁸ It is a form of social and psychological brainwashing and is accomplished by one parent, the “alienating” parent, indoctrinating the child against the other, “target,” parent.⁹ Over time, it destroys the bonds of love between the parent and child.¹⁰ When successful, it is so effective that the children themselves become unwitting accomplices and turn against the target parent.¹¹ The children then further vilify the target parent on their own, even without the further urging of the alienating parent.¹² When a child becomes an unwitting ally to the alienating parent, the child is said by some to have become a victim of Parental Alienation Syndrome (“PAS”).¹³ Psychologist Dr. Ira Turkat of the University of Florida College of Medicine, summarizes it this way:

In a nutshell, PAS occurs when one parent campaigns successfully to manipulate his or her children to despise the other parent despite the absence of legitimate reasons for the children to harbor such animosity. The effort to poison the relationship between the offspring and the targeted parent may be extensive and at times, relentless.¹⁴

In *J.F. v. L.F.*, 181 Misc. 2d 722, 694 N.Y.S.2d 592 (Family Court, Westchester Co. 1999), Judge Edlitz characterized Parental Alienation Syndrome this way:

Parental Alienation Syndrome occurs when one parent uses his/her influence with his/her child to undermine the relationship between the child and the other parent. It typically arises when the parents are engaged in divorce proceedings or a custody dispute. (*See, People v. Loomis*, 172 Misc. 2d 265, 267.) . . . [It is described] as a disturbance in which children are not merely systematically and consciously “brainwashed” but are also subconsciously and unconsciously “programmed” by one parent against the other.¹⁵

Dr. Janet Johnston described the historical recognition of this phenomenon:

The phenomenon of a child’s strident rejection of one parent, generally accompanied by strong resistance or refusal to visit or have anything to do with that parent, was first recognized by Wallerstein and Kelly (1976, 1980) in their seminal study on children of divorce. They described it as an “unholy alliance” between an angry

parent and an older child or adolescent. Later, [Dr. Richard] Gardner (1987, 1998) coined the label “parental alienation syndrome” (PAS) to describe a diagnosable disorder in a child in the context of a custody dispute, and it is this entity which has generated both enthusiastic endorsement and strong negative response.¹⁶

The touchstone of Parental Alienation Syndrome is where a child’s anger or animosity is disproportionate with the reasons given by the child for that anger or animosity. Dr. Gardner’s formulation of PAS includes several components:

The first is a child who exhibits excessive hatred of a target parent (an animosity that often extends to the parent’s extended family), makes weak, frivolous and absurd complaints, justifies the stance by quoting “borrowed scenarios,” and lacks any ambivalence or guilt towards the hated parent. The second component is a vindictive parent who is involved in consciously or unconsciously brainwashing the child into this indoctrinated stance; and third, are false allegations of abuse that are generated by the alienating parent and child.¹⁷

Dr. Johnston herself, however, suggested a slightly different focus when analyzing children who are estranged from the non-custodial parent.

Dr. Johnston’s Formulation

Dr. Janet R. Johnston was part of a task force convened to study the problem of children who were alienated from one of their divorcing parents.¹⁸ She presented her article at the International Conference on Supervised Visitation.¹⁹

Dr. Johnston disagreed to some extent with Dr. Gardner. She believed that the focal point of the inquiry should be the child and not the alienating parent.²⁰ Her formulation, therefore, is simpler: “An alienated child is defined as one who expresses, freely and persistently, unreasonable negative feelings and beliefs (such as anger, hatred, rejection and/or fear) toward a parent that are significantly disproportionate to the child’s actual experience with that parent.”²¹

Although there may be a “kernel of truth” to the child’s complaints and allegations about the rejected parent, the child’s grossly negative views and feelings are significantly distorted and

exaggerated reactions. Thus, this unusual development is a pathological response. It is a severe distortion on the child's part of the previous parent-child relationship. These youngsters go far beyond an alignment in the intensity, breadth, and ferocity of their behaviors toward the parent they are rejecting. They are responding to complex and frightening dynamics within the divorce process itself, to an array of parental behaviors, and as a result of their own early developmental vulnerabilities which have rendered them susceptible. While the profound alienation from a parent more often occurs in high conflict custody disputes, it is believed to be an infrequent occurrence among the larger population of divorcing children.²²

The success of the alienation *programme* is determined by the personalities and vulnerabilities of the child and the length and intensity of the indoctrination.²³ "[T]he intensity and longevity of the alienating processes, when combined with other important parent and child variables . . . might create exponentially unbearable pressures on the child, resulting in alienation from a parent."²⁴

Methods of Alienation

Alienating parents employ many different techniques to program their children away from the target parent. Many of them are apparent. Others, though insidious, are just as pernicious. Some methods are intentional, deliberate and willful, while others might even be utilized subconsciously by the alienating parent.

One of the "basic techniques" alienating parents use is to send the message, either overtly or subtly, that the target parent is insignificant or irrelevant to the child.²⁵ This may be done by ignoring the target parent at social functions and elsewhere, or by denying or refusing to acknowledge his existence.²⁶ By choosing to "never talk about the other parent," a subtle message is sent that the other parent is insignificant.²⁷

The target parent's insignificance can also be signaled by using body language to show that he is unworthy or insignificant.²⁸ The alienating parent might avoid eye contact with the target, use a hand gesture that is dismissive or indicates negativity, look away when he is present, or, when the child raises the other parent in conversation, abruptly terminate the conversation.²⁹ Children are attuned to these subtle signals and interestingly enough, often adopt them and "mirror

[these] physical pattern[s] in counseling or other evaluation sessions."³⁰

Another common technique is the destruction or desecration of photographs of the target, or otherwise not permitting the child to keep such photographs or mementos of the other parent.³¹

The alienating parent may exclude the target parent by not relaying messages that are sent by the target to the children.³² They might "forget" telephone messages left for the children or "lose" the letters or postcards sent them.³³ She might also "forget" to relay holiday greetings or even lie and tell the children, "Your father hasn't called."³⁴ In addition to excluding the target, the alienating parent often intends to make the children feel unwanted so that they develop hostile and distant feelings towards the target.³⁵

Another insidious but powerful method of excluding the target is for the alienating parent to refuse to acknowledge any positive experiences the children have with him.³⁶ By not responding "to the excitement and joy" the children express about the other parent and acting indifferently to their excitement, the alienating parent effectively marginalizes the target. "This 'ho-hum' approach has the effect of numbing the children from sharing [their positive] experiences with the programming parent."³⁷

Ironically, when the children later learn to suppress their happiness and joy, the alienating parent then claims that the children are "sad" when they return from being with the target:

Interestingly, the programmer may then claim that the children are not benefiting from contact with the other parent because "they are gloomy when they return." The gloom may be a result of the children giving the brainwashing parent what he or she wants—an unhappy child. This accounts for the opposing views divorced parents hold concerning the time the children spend with the other. One parent says, "I think they had a great time." The other says (sarcastically), "Sure they did." It is [also] common to find children expressing guilt about enjoying the target parent as a result of this nonsupport from the programming/brainwashing parent.³⁸

A parent may also subtly, yet powerfully, attack the target by attacking his family, career, living arrangements, travel, activities, associates or any other circumstance identified with him.³⁹ Attacking the target indirectly in this way also provides the alienating parent with "cover" to deny the attack.⁴⁰ The child may also be

forced to take sides in the battle between the parents as issues are raised and discussed with the child that should only be discussed with the other parent.⁴¹ Children understand the undercurrents of parents' statements. A child, therefore, is likely to understand the statement, "Our summer vacation would really be fun if we had more time," to mean that the target parent is preventing the child from having a fun vacation with her.⁴²

Another method routinely used by alienating parents is to manipulate or rearrange the child's time schedules so that the child "does not have time" to see the other parent.⁴³ "The manipulation of time becomes the *prime weapon* in the hands of the alienator, who uses it to structure, occupy, and usurp the child's time in order to prevent 'contaminating' contact with the lost parent."⁴⁴ This elimination of or decrease in contact, prevents the target parent from maintaining his bond with the child:

Situations in which contact between the non-custodial parent and the child is diminished enhance the viability of successful programming. If a child does not have much contact with one parent, he or she is not afforded the experiences needed to contradict the programme. . . . [Deprogramming] can best be done through increased experience and physical contact between the target and child.⁴⁵

An alienating parent may also exclude the target parent by failing to inform him of important events in the child's life:

Not informing the other parent of school dates, plays, conferences, ceremonies, awards, sporting events, and the like is a way of signifying to the children that the other parent lacks importance. . . .

Children are deeply affected by the presence or absence of parents at educational, social and religious functions. After a time, they develop the veneer of an "I don't care" attitude. After interviewing 200 children between the ages of four and eighteen years on this issue, it was noted that virtually every child desired both parents to be present at as many of these functions as possible. Children would say, "Even if my dad can't make it, my mother should have told him." . . . Clearly, children are often aware that one parent does not participate in social functions due to

the aggressive nature of the other parent. Children know this, even in cases where they say that the aggressive parent is positive and constructive in other ways.

In more extreme cases, the brainwashing parent actually obstructs the flow of information to the target parent by not supplying schools with his or her proper name and address. One of the most common problems in custody-conflicted families is that the mother places the stepfather on the educational records as the father of record. In a review of our cases, we found that mothers were five times more likely to participate in this behavior than fathers. Fathers did not appear to have the same social need to present the stepmother as the mother, whereas mothers had a very strong need to present stepfathers as "the" father. As part of this pattern, mothers seem less comfortable in attending social functions when the birth father is present. Fathers on the other hand, seem to have a greater sense of comfort in attending social functions when the birth mother *is* present.⁴⁶

Denigration may be used by making moral judgments against the target parent's values, lifestyle, choice of friends, career or financial or relational successes or failures in life.⁴⁷ These criticisms are often:

insidious, occurring over a period of time with different degrees of intensity but always powerful. Like the wearing away of a stone constantly assaulted by waves, the child's perception of the target parent changes from its original, more positive, view finally conforming to the programming parent's opinions and sentiments.

In such cases, the effect is almost irreversible. These children are no longer able to accept both parents as equally good. . . . These beliefs become so ingrained that the parent who created them no longer has to promote the desired perceptions. They have been given life within the child's own mind. So much so, that the parent may honestly report that he or she is not actively doing anything by word or deed to thwart the target parent's relationship with the child.⁴⁸

Even without deliberately intending to interfere with the other parent's relationship, a parent whose view of the other is "colored," might naturally "selectively perceive and distort" the child's relationship with the non-custodial parent.⁴⁹ Because the parent's view of the child's interaction with the other parent is distorted, the parent may unintentionally distort the child's view:

[I]t is common for the couple's expressed disappointments with each other to be mirrored in their concerns for how the other parent will treat the child. For example, if a woman has experienced her ex-spouse as emotionally neglectful, she expects him to be neglectful of her child. If the child then comes back upset or depressed after spending time with his dad, the mother attributes the difficulty solely to the father's lack of care. At the same time, other, more positive aspects of the father-child relationship are ignored or denied (i.e., the fact that this father and child have a lot of fun together and that the child feels a painful loss each time they part). In responding sympathetically to her child on his return home, the mother incorrectly interprets and then amplifies the child's sadness and anxiety. As a result, the child's emerging reality testing about his own feelings and ideas are ever so slightly and insidiously distorted. Furthermore, the mother's own anxiety and distress about her child's sadness are intensified because she is not able to communicate and clarify with her ex-husband about why the child might be upset. She is left feeling helpless about protecting her child.⁵⁰

An alienating parent may also attempt to characterize normal differences with the target parent as "good vs. bad" or "right vs. wrong."⁵¹ Doing so places the children in the middle of the battle and requires them to choose sides in their parents' conflict.⁵²

A parent might also constantly evoke and remind the child of a relatively insignificant early traumatic incident.⁵³ Though the incident may have occurred, it would otherwise likely have been forgotten or not have a strong impact on the child.⁵⁴ By constantly evoking and emphasizing the incident, the parent imbues it with greater significance and uses it to a tactical advantage to create "a family legend that can contribute to child alienation [and] estrangement."⁵⁵ In these cases, there is a mix of realistic and unrealistic fear, anger and avoidance that needs to be distinguished.⁵⁶ "Sometimes, earlier disciplinary interactions involving angry

or confrontative (but not abusive) behaviors by the rejected parent are repackaged as confirmation of violence toward the child."⁵⁷

An alienating parent might become "emotionally abandoning, rejecting, or even vengeful" to a child who expresses his or "her own individual needs" (who "individuates") or who expresses a desire "to move toward the other parent."⁵⁸

When 5-year-old Sally expressed a wish to call her father on the phone and tell him how she learned to jump rope that day, her mother withdrew into sullen anger. Inexplicably to Sally, her mother was "too tired" to read her [the] usual bedtime story that evening.⁵⁹

After a while, however, the child figures out that contact with the target parent produces this reaction with the custodial parent.⁶⁰ Doctors Johnston and Roseby point out that in such cases, because "the punishing message is typically unspoken [it] is . . . impossible to be spoken about, which makes it even more pernicious" and difficult to detect.⁶¹

Sometimes, when a child shares stories of happy times with the other parent, the discussions will be met with anger and negativity or apathy. Although initially the reaction is confusing, a child soon absorbs the message: "I don't like it when I hear that you love your mother, or enjoy your time with her. I don't like you for loving her."

After the rule within the message is learned, it becomes too risky [for the child] to share any more positive or happy scenarios. Herein lies the beginning of the programmer's power. The child knows that he or she is not likely to lose the nonprogramming parent's love, because no matter what, it has been proved to be unconditional. However, the child has observed and has been the recipient of the conditional love of the programmer and must move to cement that love through abject compliance—even to his or her own detriment.⁶²

"Sometimes the mere presence of the child, or the child's physical resemblance to the ex-spouse, produces a toxic, phobic reaction in the [alienating] parent."⁶³ Similarly, if the child acts like the target parent, the custodial parent may feel "resentment, even rage, toward the child, who at that moment is undifferentiated from the hated or feared ex-partner."⁶⁴

Children learn early on to avoid negative consequences.⁶⁵ They also avoid situations which might be somewhat similar, even if only in their minds, to those that gave rise to the negative consequences.⁶⁶ Thus, “[a] youngster who associates his father’s arrival to pick him up for visits with another parental fight [may become] immobilized when his father calls him on the phone.”⁶⁷

Similarly, a child who constantly hears disparaging remarks about a parent, may lose confidence in and love for that parent and feel intolerably confused:

Extremely negative views of the rejected parent may be freely, angrily and repeatedly expressed to the child by the [parent with whom the child is “aligned”]: “She never wanted you,” “I was your *real* parent,” “You call me if your dad touches you anywhere,” “I’m sure he’ll be late as usual.” The effect of the continued drumbeat of negative evaluation of the parent is to erode the child’s confidence in and love for the rejected parent and to create intolerable confusion. These evaluations might also be expressed indirectly, covertly, or unconsciously and might include innuendoes of sexual or child abuse or implications that the parent is dangerous in other ways. Whether such parents are aware of the negative impact on the child, these behaviors of the aligned parent (and his or her supporters) constitute *emotional abuse* of the child.⁶⁸

Alienating parents may also conceal their manipulations by claiming to permit the child to decide whether the visitation should occur. Of course the alienating parent has already, consciously or subconsciously, indicated to the child what the “correct” choice should be:

Visitation with a targeted parent is often sabotaged with subtle PAS programming. For example, a child in a PAS environment becomes attuned to the alienating parent’s desire for the child to despise the other parent. To secure acceptance, the child may make statements that suggest an uncertainty about visiting with the targeted parent or a lack of desire to do so; the alienator may then act in a “neutral” manner by instructing the child to believe that it is the child’s decision whether or not to visit with the other parent. This “neutrality maneuver” serves to further

alienate the targeted parent by “passively” discouraging the child from participating in visitation. Under these circumstances, the child is likely to learn quickly to avoid open expressions of interest in visiting the “hated” parent.⁶⁹

Children at different ages may have different motivations for refusing visitation with the non-custodial parent.⁷⁰ “For example, a four-year old might resist visitation because of difficulty separating from a primary caretaker, [w]hereas a seven-year old who refuses to visit his other parent may fear retaliation and abandonment by the aligned parent, [and] a preadolescent might be choosing a stance that looks like alienation as a way of coping with an unbearable loyalty conflict in a chronically conflicted divorce.”⁷¹

“Anxious, fearful, and passive children lack the resiliency to withstand the intense pressures of the custody battle and the aligned parents’ alienating behaviors. It might be psychologically easier for them to choose a side to avoid crippling anxiety. Children with poor reality testing are more likely to be vulnerable.”⁷² “In addition, poor self-esteem makes children especially susceptible to promises of enduring love, especially when a parent has been rejecting and ambivalent toward the child.”⁷³ Children who are insightful, clear thinking, and morally developed can often maintain a greater balance through the high-conflict divorce.⁷⁴ “Although pressured by alienating processes and parents, they can analyze their parents’ behaviors and the nature of their parent-child relationships and, despite their anger and sadness . . . stay connected to each parent.”⁷⁵

Several factors increase the vulnerability of children to alienation. “Those children who are very dependent on the aligned parent, either emotionally or physically, are . . . more likely to respond to alienating processes and behaviors. Some of these youngsters have a history of being conditionally loved and erratically rejected by the aligned parent, and the child’s complete rejection of the other parent might offer a long-sought opportunity to achieve total acceptance and unconditional love.”⁷⁶

“Most often, aligned parents’ behaviors reflect several organizing beliefs that might not be consciously spiteful and vindictive but nevertheless are potentially very damaging to the child’s relationship with the other parent. As a consequence of their own deep psychological issues, the aligned parent can harbor deep distrust and fear of the ex-spouse and be absolutely convinced that he or she is at best irrelevant and at worst a pernicious influence on the child. Consequently, a first major organizing belief is that their child does not need the other parent in their lives. Although aligned parents might insist that the child is free to visit, the rejected

parent's attempts to visit or contact their child frequently are seen as harassment. Phone calls, messages, and/or letters often are not passed on to the child. Information about school, medical, athletic, or special events are not provided to the rejected parent, in effect completely shutting that parent out of the child's life. In the most extreme cases, all references to the rejected parent are removed from the residence, including pictures (which might be torn apart in front of the child to exclude that parent). In such situations, most children quickly learn not to speak of the rejected parent. In response to requests for access by the rejected parent, the aligned parent strongly supports their angry child's 'right to make their own decision' about whether they will visit."⁷⁷

"[A] brainwasher [who] knows that the target parent is a homebody and that the child enjoys activities, [may] go out of the way to plan exciting adventures both on their time and during the time when the child is with the target parent. Rather than protecting the parent-child relationship and encouraging contact, the brainwasher makes sure that the child hears a detailed accounting of what he or she missed out on. If these scenarios recur, most children come to resent the 'sacrifice' they are making by spending time with the target parent. . . . The result is a child who no longer desires to have continuing contact with a parent unless entertainment is promised."⁷⁸

A brainwashing parent may also induce fear and anxiety in a child by raising questions about any one of the child's many "root . . . childhood fears."⁷⁹ Children are very concerned for their safety and security and fear that they will not be taken care of.⁸⁰ By implying that the target parent will not care about or protect a child, the alienating parent can create "disequilibrium between the [target] parent and child."⁸¹

A brainwashing parent may also attempt to "elevate" a new spouse to replace the child's biological parent.⁸² One such parent, "threw a glass of water in the child's face whenever she refused to call the stepparent 'Daddy.'"⁸³

Doctors Kelly and Johnston point out that "there is often significant pathology and anger in the parent encouraging the alienation of the child."⁸⁴ An average parent, unencumbered with emotional shortcomings, would "seek different avenues and more rational means of protecting their child," "[e]ven where there [has been a] history of child abuse," rather than alienating the child from that parent.⁸⁵ Other doctors have similarly observed that the typical alienating parent has a personality disorder.⁸⁶ "[T]he alienating parent is one who uses denial to cope with emotional pain, lacks a capacity for intimacy, is overly suspicious and distrustful, has a strong sense of entitlement, and has little anxiety or self-insight."⁸⁷

Symptoms of Alienation

A child does not naturally cut off contact from a parent who displays love and affection for the child. Thus, when a child avoids contact with a parent, the reason for it must be understood.

The greatest indicator of alienation is an adversity by a child to a parent that is disproportionate to the reasons given by the child for it.⁸⁸ Thus, the first question to ask when confronted with a possible alienation situation is whether the child's claimed reasons for not seeing the parent can reasonably justify the break-off of contact between them. If the reasons cannot justify the lack of contact, there is a significant likelihood that alienation has occurred.

Another indicator of alienation is a child who shows affection to the target parent when the other parent is absent, but acts indifferently or defiantly to the target when in the presence of the other parent.⁸⁹ Such an "inconsistent 'chameleon' quality is a diagnostic hallmark of [alienation]."⁹⁰

Confusion or ideas that are inconsistent with the child's observations are also common indicators of alienation,⁹¹ as is a child who has repeatedly received negative information about the non-custodial parent.⁹² A child who portrays a parent as "immoral, cheap, irresponsible or unloving, or uses any other globally negative descriptive terminology" has likely been subjected to alienation.⁹³ Similarly, "collusion or [a] one-sided alliance" by the child with one parent is a signal of potential alienation.⁹⁴

The child who works simultaneously with one parent and against the other is typically operating in collusion with the brainwasher and will be unable to maintain a positive relationship with the target parent. These children closely identify with the brainwasher and behave like a spy or conduit of information. They view the broken family in terms of "us" versus "him or her." The more entrenched the identification, the less able the child is to accept positive gestures or sentiments from the target parent. Perceiving the target parent as acting against "us," any positive features that the target parent possesses are reinterpreted as intended to inflict hurt. The most benign deed, such as giving the child a present, is analyzed for scurrilous motives and becomes a "buy-off" or prompts a statement such as, "Big deal—where's the support check?"⁹⁵

Other symptoms which might indicate alienation include an unnatural rigidity within a child or a maturity level "that noticeably veers away from the familiar for that particular child."⁹⁶ Similarly, a child who "sits in lofty moral judgment of a parent has usually been programmed to believe that [the target] parent is leading an immoral life."⁹⁷ A child who responds to parental discipline by threatening, "If you—scream/punish/hit/give me a curfew/make me sit here and do homework/make me do housework/cook/take away my car—I'll tell Mom [or the judge]" has most likely been similarly programmed.⁹⁸ Confusing the child as to a birth parent's importance *vis à vis* a stepparent or significant other, can signal a "programme" and an attempt to "elevate" a new family to replace the old.⁹⁹

Target parents are often criticized no matter what they do.¹⁰⁰ "Even though the brainwasher may be doing the same thing with the child as the target parent, . . . the target parent's behavior . . . is [often portrayed as] fraught with foreboding problems for the child's future."¹⁰¹

Though parents frequently "report that a child is afraid to go off with the other parent . . . some fears have no connection to reality and are irrational fears that evolve from programming and brainwashing or from the emotional atmosphere created by a fearful parent."¹⁰²

Effects of Alienation

The estrangement of a child from one of its parents may be cataclysmic to the child's long-term development and well being. It is likely to have catastrophic consequences for that child throughout the child's life and, as will be shown, is likely to effect future generations as well.

A Child's General Need for Both Parents and the Anguish of War

Every child needs both parents to develop properly.¹⁰³ That is because throughout our lives we subconsciously base all of our expectations and model all of our relationships on the relationships we had with both of our parents.¹⁰⁴ The elimination of a parent from a child's life, therefore, has life-long consequences for the child.¹⁰⁵ "For those children who remain with the alienating parent and lose contact with the targeted parent, the losses are enormous."¹⁰⁶

Even when there is no alienation, psychologists have noted that long, intense divorce battles cause severe psychological problems for children.¹⁰⁷ "[M]arital and divorce conflict that focuses on the child, and high intensity and overtly hostile marital conflict, are well established predictors of psychological adjustment problems in children."¹⁰⁸

Children are more at risk to be pulled into the high-conflict divorce as major players and Greek chorus. . . . The intensity of the conflict, its continued burdensome presence for one or more years, the polarization of extended family and larger community, and the failure of parents to address their children's needs combine to create intolerable anguish, tension and anger for children. One psychological resolution for the child is to diminish the feeling of being torn apart by rejecting the "bad" parent and ceasing all contact.¹⁰⁹

"In situations where parents are litigating custody, children who are aware of the battle are almost always caught up in the escalation, and feel powerless to hinder it. One day they tell Mom what she wants to hear; the next day they do the same with Dad. Most children do not want to make . . . custody decisions, intuitively understanding that to do so could carry the burden of dreadful rejection of one parent or the other."¹¹⁰

"The loss [to a child of the relationship with a parent] cannot be undone. Childhood cannot be recaptured. Gone forever is that sense of history, intimacy, lost input of values and morals, self-awareness through knowing one's beginnings, love, contact with extended family, and much more. Virtually no child possesses the ability to protect him- or herself against such an undignified and total loss."¹¹¹

Children deprived of a parent may, as a result, suffer loss, guilt, confusion, fear, powerlessness, identity crisis, anger, withdrawal, anxiety, a retreat into a fantasy world, hopelessness, inadequacy, fears, phobias, depression, suicidal ideation, sleeping and eating disorders, academic problems, withdrawal from one or both parents, drug abuse, peer group problems, obsessive-compulsive behavior, motor tension (tics, fidgeting or restlessness), psychosomatic disorders, damaged sexual identity and other problems.¹¹² Some children will "act in" rather than act out and, internalizing their emotions, "develop psychogenic constipation, headaches or stomachaches or suffer from emotional withdrawal, experience academic or social problems at school, or become severely depressed."¹¹³

Anxiety

By inculcating a message that children are not permitted to love both parents, alienating parents make children feel anxious each time "they wish to express love to the target parent. They might feel anxiety over the smallest gesture, such as making a Father's Day card in school but not being able to present it to the [other] parent."¹¹⁴

Hiding Affection

A child who senses that a parent disapproves of the other, might show affection to the target parent only when alone with him or her.¹¹⁵ When the other parent is present the child may act indifferently or even in a hostile manner to the target parent.¹¹⁶ Thrust into this “who[m] do I betray?” situation “creates the passage-way for the possibility of actual delusional thinking” by the child.¹¹⁷

Leaving a child in this pathological environment is most damaging and, under these circumstances, a child may many times become anxious, isolated and depressed. In time, if proper intervention is not forthcoming, the child develops a deep and profound sense of self-hatred and shame for condemning the other parent. These children tend to become despondent, withdrawn, and develop psychopathic manipulative characteristics which may be carried into adulthood.¹¹⁸

Making Sense of the World

One of the core concerns for children, generally, is to learn to determine what is true and what is false.¹¹⁹ “Ordinarily, children use their parents as [a] social reference for what is safe and trustworthy.”¹²⁰ Children whose parents are battling however, “have the profound dilemma of making sense out of vastly contradictory views communicated through the hostility, fear and distrust of their opposing parents (Who is safe? Who is dangerous? Whom can you trust?).”¹²¹ This leaves them confused and anxious and prevents their normal development.¹²²

Moreover, by necessity these children must stay attuned to the “emotional states and needs of their custodial parent.”¹²³ Imparting such great importance to a parent’s emotional needs reduces the children’s sense of self-importance in relation to others.¹²⁴

Lack of External Resources

Children may “withdraw into themselves as they are forced to close off from the target parent.”¹²⁵ They may also retreat into their own secret fantasy world in a desperate effort to maintain the much-needed contact with the rejected parent.¹²⁶ As a result, youngsters who have survived their parents’ intense battles:

are likely to be hypervigilant and distrusting of others, and do not expect the world to be a cooperative or protective place. Unlike typically developing children, who tend to turn to others, especially adults for their needs, these children turn inward, unto themselves,

to figure out how to solve problems and interpret social reality. Unfortunately, their inner resources are likely to be meager, because these children defend against the double-binding inconsistency of their most significant relationships by avoiding complexity, ambiguity, and spontaneity. . . . The bind is that, as children turn inward, they must rely on an increasingly impoverished and distorted understanding of the nature of reality. Paradoxically, their path to safety leads them further and further away from new self-realizing possibilities.¹²⁷

Self-Blame

Children typically feel responsible for their parents’ disputes and divorce.¹²⁸ Yet they feel powerless to do anything about it.¹²⁹ These contradictory feelings of super-importance but inadequacy and powerlessness can be psychologically devastating to children:

“If I were dead, they wouldn’t need to fight anymore” is a tragically self-blaming, depressive fantasy that is not uncommon. Feelings of great power and importance are juxtaposed, therefore, with paradoxical feelings of being overwhelmingly inadequate in the face of the parents’ intractable anger. Hence the child’s sense of agency, competence, or power is undermined. It follows that these children often have trouble directly asserting their own needs and wishes. Instead, they are likely to maintain an underlying oppositional and alienated stance masked by a compliant eagerness to please others. This facade can be maintained only until the children become overwhelmed by their own neediness, at which time they regress or explode into irritable-distressed or demanding-aggressive behavior.¹³⁰

Identification with the Rejected Parent

All children contain characteristics of each of their parents. A child who rejects a parent, therefore, necessarily has to reject and loathe that part of him- or herself that is similar to the rejected parent.¹³¹ Such a child is necessarily “vulnerable to self-loathing, self-rejection, and confusion regarding sex-role identification.”¹³² The more the child resembles the rejected parent, the more the self-loathing is intensified.¹³³

Additionally, a child who sees one parent rejected by the other, likely fears being rejected him- or herself—for possessing the same characteristics as the rejected

parent.¹³⁴ "Sensing that the programmer/brainwasher detests the other parent, the child fears that she or he may be similarly detestable."¹³⁵ This scenario is especially difficult for those children who do not spend much time with the target parent whom they may be most like. Isolated from the target, these children can suffer through childhood or adolescence with lonely feelings of rejection over nothing within their power to control."¹³⁶

The mere witnessing of one parent's antipathy toward the other can ultimately lead to self-repudiation by biological association. It is through mothers and fathers that boys and girls form masculine and feminine identities. Children should feel as though they are accepted and valued by both the same- and opposite-sex parents. Parents can only provide this integration of personality to their children by actively participating in their upbringing. Without self-acceptance derived from parental acceptance of the child, personality conflicts and social-adjustment disorders often arise, persisting into adulthood.¹³⁷

Hopelessness and Inadequacy

In other ways, too, the alienated child is made to feel hopeless and inadequate:

Inability to cope with such emotionally overwhelming situations often induce feelings of powerlessness, hopelessness, and inadequacy that can spill over into other areas of life. If a child has the desire to enjoy a positive relationship with a target parent and there is ongoing programming and brainwashing, what is the child learning? One lesson is that those who supposedly are there to love and protect the child are not fulfilling those responsibilities and that they are unresponsive to the child's needs.

Confusion is compounded when these children observe peers with separated or divorced parents who work cooperatively and in a mutually respectful manner in their children's best interests. [As o]ne nine-year-old enviously asked during a home visit on a custody case, "Why can't my mom and dad just work things out on the phone like my stepsisters' parents instead of just yelling at each other and hanging up?"¹³⁸

Rigid View of the World

In order to remain aligned with one parent and to reject the other, the child must believe that one is "pure" and "good" while the other is "evil" and "bad."¹³⁹ Such a rigid view of the world is unrealistic and prevents the child from accepting the good and bad, the pure and evil, within him- or herself.¹⁴⁰ Children must learn to acknowledge, tolerate and integrate "the 'bad' parent with the 'good'" into a more realistic view of each parent (whole object representation) and, at the same time, form a cohesive, integrated sense of the 'good' and the 'bad' in him- or herself (self-constancy).¹⁴¹ This "is made extremely difficult" when the child has been alienated from one of its parents.¹⁴²

When children maintain this kind of rigid separation between good and bad, they are bound to strive for an impossible perfection in themselves and other people. Each failure represents an intolerable fall from grace. This most fundamental failure (i.e., to achieve self- and object constancy) is reflected in the pervasive absence of basic trust that testing reveals in these children. It is not difficult to imagine that these polarized shifts from perfectly good to perfectly bad make trusting oneself or others, from moment to moment, a virtually impossible task.¹⁴³

Although the child seems to function well enough in certain situations, this merely masks the deep psychological, tumultuous issues percolating within them:

It is important to note that some alienated children—although they present as very angry, distraught, and obsessively fixated on the hated parent in the therapist's or evaluator's office—appear to function adequately in other settings removed from the custody battle. They might retain their school performance, might continue to excel in musical or athletic activities, and at least superficially seem reasonably well adjusted. A closer look at their interpersonal relationships, however, often reveals difficulties. Alienated children's black-and-white, often harshly strident views and feelings are usually reflected in dealings with their peers as well as those in authority. However, it is in the rejected parents' home that the child's behavior is severely problematic and disturbed. They might destroy property; act in obnoxious, even bizarre ways; and treat

these parents in public with obvious loathing, scorn, and verbal abuse.¹⁴⁴

Repression

To cope with their parents' ongoing conflict, children may repress their own emotions.¹⁴⁵ Such repression inhibits the child's capacity to perceive, understand and tolerate his or her own feelings.¹⁴⁶ It also inhibits the child's ability to empathize with the feelings of others. This further inhibits the child's social development and "disrupts the achievement of empathy [which is] the basis for interpersonal morality."¹⁴⁷

Parental Dependency

To alleviate the feeling of loss caused by the breakup of the marriage, a parent might cling dependently to the child.¹⁴⁸ The child, sensing the parent's emotional need, might in turn cling to that parent and avoid visitation with the other parent.¹⁴⁹ When the child leaves for visitation, the parent may experience a renewed threat of abandonment by the child.¹⁵⁰ This provokes "intense anxiety and covert hostility toward the child."¹⁵¹ "Not surprisingly, these children themselves then become ambivalent about separating [from the custodial parent]. Alternatively, some children . . . react as if the parent's very survival depends on their constant vigilance and caretaking."¹⁵² Neither of these reactions are healthy for the child.¹⁵³

Secondary Rejection(s)

Years later, when an alienated child ultimately realizes that he or she has been the victim of alienation and brainwashing and has lost out on so many years of joyful experiences that could not be shared with the alienated parent, the child will likely feel anger and alienation towards the programming or brainwashing parent.¹⁵⁴ As the child pulls away from that parent, it experiences a secondary loss from the alienation¹⁵⁵—the loss of the alienating parent as well.¹⁵⁶

But that is not the sole extent of the harm to the alienated children. Alienated children are generally also angry with the target parent for "giving up" and not fighting harder to maintain a relationship with them.¹⁵⁷ That is because children attribute greater control and power to their parents.¹⁵⁸

Because children need to feel protected, they must believe that their parents are omnipotent and powerful.¹⁵⁹ Thus, children believe their alienated parent could break through and see them if only the parent had tried harder.¹⁶⁰ When the parent becomes completely alienated, the child will likely blame him.¹⁶¹

Though a child may never actually verbalize these feelings, in the child's "inner, secret world" the child "fervently hopes" that the target parent will "be strong, brave, able to intuit their unspoken secret wishes," and

continue to fight to see them until they are successful.¹⁶² Children expect:

that the target will know how to rescue them from the programmer/brain-washer and not give up. Target parents almost always express surprise upon hearing that their children want them to be strong and not submit or back away from litigation. Some of these children may seem overtly allied with the programmer but covertly wish the programmer's power be toppled. These children are fake conformers who appear to be programmed as a survival technique.

Too many parents retreat from pursuing increased time or joint or primary custody due to the mistaken perception that taking action could damage or permanently effect an already conflicted and confused child. Such parents often censor themselves, recoil, or back off after having been given advice that the cards are stacked against them in a no-win situation. Some parents find their finances depleted and, subsequently, are forced to give up. Others fear that litigation may cause more harm than good. Not having access to a crystal ball, they do not trust the wisdom of the legal system due to "horror stories" they may have collected about parents losing time or custody just seeking modification. And still others are unwilling to legally pursue their children due to apprehension of potentially serious emotional and economic assault to themselves, their remarriage, and/or their new family. The target parent's reaction to the programmer/brain-washer and to the child is clearly a key variable in the success or failure of the programme.¹⁶³

Counter Rejection

As a defensive mechanism, a parent who is rejected by his or her children, will often "counter-reject" the children as well.¹⁶⁴

When rejected parents feel that they are being abusively treated by an alienated child who is refusing all efforts to reconnect, they can become highly affronted and offended by the lack of respect and ingratitudo afforded them. Hurt and humiliated, some rejected

parents react to the child's alienation with their own rejection. Their anger might also stem from sheer frustration and lack of patience or might arise from retaliatory needs to treat the child in the same manner in which they have been treated. The counterrejection is felt by the child, and reinforced by the aligned parent, as confirmation of the rejected parent's lack of interest and love, which often leads to intensified condemnation of the "bad" parent.¹⁶⁵

Guilt

Guilt is another feature "that indelibly colors a child's social-emotional life. Feelings of guilt can emanate from complying with the programme and acting against the target parent."¹⁶⁶

Although they understand the manipulations, most children are not polemically secure enough to successfully deter a brainwashing parent. Unless the parent senses that he or she is losing the child emotionally or through the court's decision to modify custody, he or she will continue to apply pressure on the child. Children who understand and comply with the brainwasher's desires pay the price through developing guilt. They are in conflict because they do not necessarily believe what they are being told. However, they feel compelled to think, feel, or behave in ways that go against their own set of values and will comply nevertheless.

Children may have feelings of guilt . . . for not revealing their true (good) feelings toward a parent; for shunning or rejecting a parent at an event, in public, at pickup time, or when alone with that parent; . . . or for punishing a parent by being verbally or physically abusive. Often, children come to believe the target parent may be angry or hate them due to behavior they know is wrong but they still engage in.

This sense of estrangement propels them deeper into the brainwasher's camp. This scenario is problematic for such children because, nowhere, can they be true to their hearts. The brainwasher's love and understanding is questionable, and the target parent may have become distanced. A child caught in this bind does not ordinarily possess

the skills (or bravery) necessary to confront the brainwasher and to assert himself or herself. Feelings of guilt for having "hurt" the target make it difficult to approach that parent. The target parent may have simultaneously been programmed to believe that the child is rejecting and unloving, so that reaching out is obstructed. The child and target parent become polarized, which was exactly the brainwasher's goal. So, brainwashers can successfully implement and carry to fruition their goals even when a child understands what is transpiring.¹⁶⁷

Even if the alienated parent has not actually counter-rejected the child, the child usually assumes that the parent has done so.¹⁶⁸ "A child who loses contact with a target parent resulting from pressure or through compliance usually fears that the target parent has become angry. Almost every child with whom [Dr. Clawar has] spoken—those who testified in court or those who did not have the strength or the skills to overcome the programme—believed that the target parent was angry with them beyond reprieve."¹⁶⁹

Confusion

The fight for the "minds and bodies" of the children throw the children into turmoil and confusion.¹⁷⁰ "Loyalty conflicts are common and usually fraught with confusion."¹⁷¹ This is especially true when the child is "fed untrue stories about a target parent that runs counter to [the child's own experiences with that parent,—the child's] observational data."¹⁷²

Confusion and anxiety are increased when a child perceives the target parent to be good and loving, but constantly receives the message that the target is bad.¹⁷³ The child is further confused by wondering why he or she is not permitted to love both parents freely.¹⁷⁴ Similarly, when a child hears that the parent claims to permit the child to visit with the other parent, but observes the parent's body language and actions that belie that permission, the child can become "profoundly confused."¹⁷⁵

The degree of damage ultimately suffered by a child is directly related to "the length of time in which the assault continues unharnessed," in its intensity and severity.¹⁷⁶

Inter-Generational Effect

Equally distressing as the effects alienation has upon its child-victims is the effect it will likely have upon future generations.¹⁷⁷ Children who are alienated from a parent have a higher likelihood of becoming alienators themselves, thereby perpetuating the negative effects onto future generations as well.¹⁷⁸

[C]hildren who were raised by a programmer/brainwasher and who were significantly deprived of a target parent may learn to be proprietary and self-righteous rather than to share the children after their own divorces. Further, they are likely to repeat their parents' behaviors and patterns in times of family crises and are resistant to input and change. One possible reason for this behavior is that, as children, these parents repressed their emotional reaction to their own parents' divorce. The past is visited upon the present when repressed feelings of anger, loneliness, resentment, abandonment, and other conflicts are repeated in an attempt to achieve a belated mastery. Repetition compulsions in adulthood often are derivatives of intrapsychic injuries and disappointments experienced in childhood.¹⁷⁹

Conclusion

The severe effects alienation has upon children should compel judges and lawyers to be ever-vigilant in preventing its continuation. Part Two of this article will explore the treatments that have been effective in dealing with alienation, and the ways in which the courts in New York State have dealt with this issue.

Endnotes

1. Although alienation might be employed by either parent, because it is more likely to be employed by mothers than by fathers, [see Clawar & Rivlin, *Id.*, Ch. VII, (*The Female Factor: Why Women Programme More Than Men*)], and because mothers are more likely to obtain custody than fathers (see Brandes, 4 Law and the Family New York §§ 1:2 and 1:3), for ease of reading, this article will at times refer to the target parent in the masculine gender and the alienating parent in the feminine.
2. *Daghir v. Daghir*, 82 A.D.2d 191, 193 (2d Dep't, 1981), aff'd, 56 N.Y.2d 938 (1982).
3. *Id.*, 82 A.D.2d at 195.
4. *Id.*, 82 A.D.2d at 193–195 (citations omitted).
5. Stanley S. Clawar & Brynne V. Rivlin, *Children Held Hostage: Dealing with Programmed and Brainwashed Children*, American Bar Association Section of Family Law (1991), Table 17 at 180.
6. Joel R. Brandes, 4 *Law and the Family, New York, Child Custody* § 1:27 at 121 (2d ed., 1997).
7. *Young v. Young*, 212 A.D.2d 114, 122 (2d Dep't, 1995).
8. Ira Turkat, *Parental Alienation Syndrome: A Review of Critical Issues*, 18 Journal of the American Academy of Matrimonial Lawyers 131, 132 (2002), available at <http://www.aaml.org/Journal/18-1/MAT109.pdf>.
9. *Id.*
10. *Id.*
11. *Id.*
12. *Id.*
13. *Id.* Parental alienation as a "syndrome" continues to be a highly controversial topic. Compare, *People v. Fortin*, 289 A.D.2d 590 (2d Dep't 2001) (holding that the defendant in that criminal action did not meet his burden of proving the Syndrome's general acceptance in the scientific community), with *Zafran v. Zafran*, 191 Misc. 2d 60 (Sup Ct., Nassau Co. 2002) (permitting "Frye" hearing to determine admissibility of the Parental Alienation Syndrome theory). This article addresses the phenomena of parental alienation and the harm it inflicts upon children, without taking any position on whether parental alienation is, or can become, a "syndrome." Any references to a "syndrome" or PAS within this article is merely to integrate the verbatim quotations of other authors.
14. *Id.*, at 133 (footnotes omitted).
15. *J.F. v. L.F.*, 181 Misc. 2d 722 (Fam. Ct., Westchester Co. 1999) (citations and quotations omitted).
16. Janet Johnston, *Rethinking Parental Alienation and Redesigning Parent-Child Access Services for Children Who Resist or Refuse Visitation* (2001) (hereinafter "Rethinking"), available at www.ifp-bayern.de/-cms/BU_Johnston.pdf; Joan B. Kelly & Janet R. Johnston, *The Alienated Child, A Reformulation of Parental Alienation Syndrome*, 30 Family Court Review 249 (2001) (hereinafter "Reformulation").
17. *Johnston, Rethinking, Id.* at 1.
18. *Id.* at n.1.
19. *Id.*
20. *Id.* at 1.
21. *Johnston, Rethinking, Id.* at 3; *Kelly & Johnston, Reformulation, Id.* at 251.
22. *Johnston, Rethinking, Id.* at 4; *Kelly & Johnston, Reformulation, Id.* at 254.
23. *Kelly & Johnston, Reformulation, Id.* at 255.
24. *Id.*
25. *Clawar & Rivlin, Id.* at 15.
26. *Clawar & Rivlin, Id.* at 15.
27. *Id.*
28. *Clawar & Rivlin, Id.* at 16.
29. *Id.*
30. *Id.*
31. *Clawar & Rivlin, Id.* at 16.
32. *Clawar & Rivlin, Id.* at 16–17.
33. *Id.*
34. *Id.*
35. *Id.*
36. *Id.* at 17.
37. *Id.* at 17–18.
38. *Id.*
39. *Id.* at 18–19.
40. *Id.*
41. *Id.* at 20.
42. *Id.*
43. *Id.* at 21.
44. Elizabeth M. Ellis, *Divorce Wars, Interventions with Families in Conflict*, American Psychological Association 224 (2000) (quoting Cartwright) (emphasis added).
45. *Clawar & Rivlin, Id.* at 24–25.

46. *Id.* at 21–22 (emphasis in original).
47. *Id.* at 24.
48. *Id.* at 24–25.
49. Janet Johnston & Vivienne Roseby, *In the Name of the Child, A Developmental Approach to Understanding and Helping Children of Conflicted and Violent Divorce*, at 47 (The Free Press, 1997).
50. *Johnston & Roseby, Id.* at 48.
51. Michael R. Walsh & J. Michael Bone, *Parental Alienation Syndrome: An Age-old Custody Problem*, 71 Fla. Bar J. 93 (1997).
52. *Id.*
53. *Johnston, Rethinking, Id.* at 5.
54. *Id.*
55. *Id.*
56. *Id.*
57. *Kelly & Johnston, Reformulation, Id.* at 258.
58. *Johnston & Roseby, Name of the Child, Id.* at 50.
59. *Johnston & Roseby, Id.* at 50.
60. *Id.*
61. *Id.*
62. *Clawar & Rivlin, Id.* at 75 & 26.
63. *Johnston & Roseby, Name of the Child, Id.* at 50.
64. *Id.*
65. *Id.* at 60.
66. *Id.*
67. *Id.*
68. *Kelly & Johnston, Reformulation, Id.* at 257 (emphasis added).
69. *Turkat, Id.* at 138.
70. *Johnston, Rethinking, Id.* at 10.
71. *Johnston, Rethinking, at 10–11.*
72. *Kelly & Johnston, Reformulation, Id.* at 261.
73. *Id.*
74. *Id.*
75. *Id.*
76. *Kelly & Johnston, Reformulation, Id.* at 262; *Clawar & Rivlin, Id.* at 74–75.
77. *Kelly & Johnston, Reformulation, Id.* at 257.
78. *Clawar & Rivlin, Id.* at 74.
79. *Id.* at 80.
80. *Id.*
81. *Id.*
82. *Id.* at 84.
83. *Id.*
84. *Kelly & Johnston, Reformulation, Id.* at 258.
85. *Id.*
86. *Ellis, Id.* at 220.
87. *Id.*
88. *Johnston, Rethinking, Id.* at 1; *Turkat, Id.* at 134.
89. *Walsh & Bone, Id.*
90. *Id.*
91. *Clawar & Rivlin, Id.* at 70.
92. *Id.* at 71.
93. *Id.* at 72.
94. *Id.* at 72.
95. *Id.* at 72–73.
96. *Id.* at 75–76.
97. *Id.* at 76.
98. *Id.* at 92.
99. *Id.* at 84.
100. *Id.* at 76.
101. *Id.*
102. *Id.* at 78.
103. *Id.* at 74 & 104.
104. *Id.* at 104 (citing John Bowlby, *Separation, Anxiety and Anger*); *Johnston & Roseby, Name of the Child, Id.* at 68–69.
105. *Clawar & Rivlin, Id.*
106. *Ellis, Id.* at 226.
107. *Kelly & Johnston, Reformulation, Id.* n.1 at 264 (citing eight different studies on the subject).
108. *Id.*
109. *Kelly & Johnston, Reformulation, Id.* at 256.
110. *Clawar & Rivlin, Id.* at 107.
111. *Id.* at 105.
112. *Id.* at 129, 105–28.
113. *Id.* at 94.
114. *Id.* at 113.
115. *Walsh & Bone, Id.*
116. *Id.*
117. *Id.*
118. *Id.*
119. *Johnston & Roseby, Name of the Child, Id.* at 54.
120. *Id.*
121. *Id.* at 54–55.
122. *Id.*
123. *Johnston & Roseby, Id.* at 55–56.
124. *Id.* at 56.
125. *Clawar & Rivlin, Id.* at 112.
126. *Id.* at 113–14.
127. *Johnston & Roseby, Name of the Child, Id.* at 55.
128. *Id.* at 56.
129. *Id.*
130. *Id.*
131. *Id.* at 56–57.
132. *Clawar & Rivlin, Id.* at 111.
133. *Id.*
134. *Id.*
135. *Id.*
136. *Id.*
137. *Id.*
138. *Id.* at 114.
139. *Johnston & Roseby, Id.* at 56–57.
140. *Id.*
141. *Id.*
142. *Id.*

143. *Id.* at 57.
144. *Kelly & Johnston, Reformulation*, *Id.* at 263.
145. *Johnston & Roseby, Name of the Child*, *Id.* at 67.
146. *Id.*
147. *Id.*
148. *Id.* at 51.
149. *Id.*
150. *Id.*
151. *Id.* at 52.
152. *Id.*
153. *Id.*
154. *Clawar & Rivlin*, *Id.* at 105.
155. *Id.*
156. *Id.* at 105–06.
157. *Id.* at 112.
158. *Id.*
159. *Id.*
160. *Id.*
161. *Id.*
162. *Id.*
163. *Id.*
164. *Kelly & Johnston, Reformulation*, *Id.* at 259.
165. *Id.*
166. *Clawar & Rivlin*, *Id.* at 106.
167. *Id.* at 84–85.
168. *Id.* at 106.
169. *Id.*
170. *Id.* at 107.
171. *Id.*
172. *Id.*
173. *Id.*
174. *Id.* at 112–13.
175. *Johnston & Roseby*, *Id.* at 51.
176. *Clawar & Rivlin*, *Id.* at 104; nn. 21, 22, 106 & 107, *Id.*
177. *Clawar & Rivlin*, *Id.* at 114–15.
178. *Id.* at 115.
179. *Id.* at 115 (*citing* Otto Fenichel, *The Psychoanalytic Theory of Neurosis* (New York: W.W. Norton & Co., 1945) at 540 and 405).

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