

## **Should Courts Order PAS Children to Visit/Reside with the Alienated Parent? A Follow-up Study**

**Richard A. Gardner. M.D.**

*The question whether courts should order children with parental alienation syndrome (PAS) to visit/reside with the alienated parent has been a significant source of controversy among legal and mental health professionals. This article describes 99 PAS cases in which the author has been directly involved, cases in which he has concluded that the court should order visitation with or transfer primary residential custody to the alienated parent. The outcome when such orders were implemented (N=22) will be compared with the outcome when this recommendation was not followed (N=77).*

This is the definition of the parental alienation syndrome that I have used since my first publication on the disorder in 1985:

The *parental alienation syndrome* (PAS) is a disorder that arises primarily in the context of child-custody disputes. Its primary manifestation is the child's campaign of denigration against a parent, a campaign that has no justification. It results from the *combination* of a programming (brainwashing) parent's indoctrinations and the child's own contributions to the vilification of the target parent. When true parental abuse and/or neglect is present, the child's animosity may be justified, and so the parental alienation syndrome explanation for the child's hostility is not applicable.

There are 8 primary symptoms and 3 types of PAS and these are delineated in Table 1. It is important to note that the level of PAS diagnosis is based on the children's behavior and not on the degree of indoctrination to which the child may have been subjected. Indoctrinators can also be divided into mild, moderate, and severe categories, but the delineation is not as well defined as that of the child. Furthermore, severe level alienators may only be "successful" in producing mild or moderate levels of PAS in their children because the strong, healthy bonding of the alienated parent has served as an antidote to the development of the severe level of PAS in the child.

The PAS arises in the context of child-custody litigation and the approaches to its alleviation, with rare exception, involve the utilization of courts of law. The mental health professionals' recommendations for dealing with these children often necessitate court implementation, e.g., court-ordered therapy, court-ordered visitation with the alienated parent, court-ordered transfer of custody, and even court-ordered imposition of sanctions against the alienating parent. Such possible sanctions include: posting a bond, fines, community service, probation, house arrest, and even short-term incarceration.

**DIFFERENTIAL DIAGNOSIS OF THE THREE TYPES OF PARENTAL  
ALIENATION SYNDROME (PAS)**

|   |  | MILD                                       | MODERATE                                    | SEVERE   |
|---|--|--|---|--|
| PRIMARY SYMPTOMATIC MANIFESTATIONS                | The Campaign of Denigration  | Minimal                                    | Moderate                                    | Formidable   |
|   | Weak, Frivolous, or Absurd Rationalizations for the Deprecation                    | Minimal                                    | Moderate                                    | Multiple absurd rationalizations   |
|   | Lack of Ambivalence  | Normal Ambivalence                         | No ambivalence                              | No ambivalence   |
|   | The Independent-Thinker Phenomenon   | Usually absent                             | Present                                     | Present  |
|   | Reflexive Support of the Alienating Parent in the Parental Conflict                | Minimal                                    | Present                                     | Present  |
|   | Absence of Guilt   | Normal guilt                               | Minimal to no guilt                         | No guilt   |
|   | Borrowed Scenarios   | Minimal                                    | Present                                     | Present  |
| ADDITIONAL DIFFERENTIAL DIAGNOSTIC CONSIDERATIONS | Spread of the Animosity to the Extended Family and Friends of the Alienated Parent | Minimal                                    | Present                                     | Formidable, often fanatic  |
|   | Transitional Difficulties at the Time of Visitation                                | Usually Absent                             | Moderate                                    | Formidable, or visit not possible  |
|   | Behavior During Visitation   | Good                                       | Intermittently antagonistic and provocative | No visit, or destructive and continually provocative behavior throughout visit |
|   | Bonding with the Alienator   | Strong, healthy                            | Strong, mildly to moderately pathological   | Severely pathological, often paranoid bonding                                  |
|   | Bonding with the Alienated Parent Prior to the Alienation                          | Strong, healthy, or minimally pathological | Strong, healthy, or minimally pathological  | Strong, healthy, or minimally pathological                                     |

**Table 1**

The PAS is an excellent example of a disorder in which mental health and legal professionals *must* work together if these children are to be helped. Neither discipline can help these children without the significant involvement of the other. Mental health professionals need the court's power to implement their recommendations and the court needs the mental health professionals to conduct the appropriate therapy. Table 2 delineates the roles that I recommend for both mental health and legal professionals in the treatment of PAS children.

### **DIFFERENTIAL TREATMENT OF THE THREE TYPES OF PARENTAL ALIENATION SYNDROME (PAS)**

|                                     | MILD  | MODERATE   | SEVERE  |
|-------------------------------------|---|--|---|
| <b>Legal Approaches</b>             | Court ruling that primary custody shall remain with the alienating parent | <p><b>Plan A</b><br/>(Most Common)</p> <ol style="list-style-type: none"> <li>1. Court ruling that primary custody shall remain with the alienating parent</li> <li>2. Court appointment of PAS therapist<sup>1</sup></li> <li>3. Sanctions:               <ol style="list-style-type: none"> <li>a. Post a Bond</li> <li>b. Fines</li> <li>c. Community Service</li> <li>d. Probation</li> <li>e. House arrest</li> <li>f. Incarceration</li> </ol> </li> </ol> <p><b>Plan B</b><br/>(Occasionally necessary)</p> <ol style="list-style-type: none"> <li>1. Court ruling that primary custody shall be transferred to the alienated parent</li> <li>2. Court appointment of PAS therapist<sup>1</sup></li> <li>3. Extremely restricted visitation by the alienating parent, monitored to prevent indoctrinations</li> </ol> | <ol style="list-style-type: none"> <li>4. Court ruling that primary custody shall be transferred to the alienated parent</li> <li>1. Court-ordered transitional site program</li> </ol> |
| <b>Psychotherapeutic Approaches</b> | None usually necessary  | <p><b>Plans A and B</b></p> <p>Treatment by a court-appointed PAS Therapist<sup>1</sup></p>  | Transitional site program monitored by court-appointed PAS therapist <sup>1</sup>   |

**Table 2**

A central problem for those working with PAS children, both in courts of law and in the therapist's office, has been the question of whether the court should order alienated children to visit with and even reside primarily with the alienated parent. This problem has been dealt with in most of my publications on the PAS since the original article in 1985 (1-20).

My general position has been that children in the *mild* category will visit voluntarily and court orders are not necessary. Furthermore, I generally recommend that the alienating parent still retain primary custodial status because that parent has usually been the primary caretaker throughout the children's lives. My experience has also been that once the custody issue is no longer being litigated, the alienating parent reduces the programming and the children become asymptomatic.

With regard to the *moderate* type, I have two categories of recommendation, depending upon the severity of the children's alienation and on the tenacity of the alienating parent. In the milder cases in the moderate category, I recommend Plan A (Table 2) in which I recommend that custody still remain with the alienating parent. This plan is applicable when the children are still visiting, but are significantly alienated. However, the alienating parent is likely to discontinue programming the children once the court concludes that the children shall remain with him (her). Parents and children in this category require court-ordered therapy with a therapist particularly knowledgeable about the special techniques necessary for the treatment of PAS children (16, 19). Such parents also need threats (and I do not hesitate to use the word) of imposition of one or more of the aforementioned sanctions if there is failure of compliance with the visitation

schedule.

Plan B (Table 2) is applicable when the children are in the moderate category, are still visiting, but the alienating parent is so tenacious with regard to alienating the children, is so compelled to continue with the programming that custodial transfer is the only hope for the children if there is to be any alleviation of their PAS symptomatology. The alienation process has become a *modus vivendi* and has become so deeply embedded in the psychic structure of the alienator that it is unlikely that the programming procedures will stop when the litigation is over. The compulsion to alienate has become locked into the brain circuitry and has a life of its own (21). Sometimes the alienating parent is paranoid and the alienated parent is the center of the paranoid delusional system. The children, although still in the moderate category, are clearly going down the path to the severe category, and there is every indication that following the end of the litigation, they will do so because the prospect of court sanctions will have been removed. Treating such children while they still remain primarily in the home of the alienator is the equivalent of trying to treat children who were indoctrinated in a cult compound and returning them to the compound between psychotherapy sessions. It is only by removing the children from the access of the alienating parent that they are likely to be helped (19). These children are still properly labeled moderate because they are still visiting with the alienated parent.

Children in the *severe* category either refuse to visit, or if they do visit, they cause significant commotion and disruption in the household of the alienated parent. They may try to poison the target parent's food, burn down the house, or run away, thereby exposing themselves to danger. In most cases, no visitation is possible because of the grief visited upon the alienated parent when they are in his or her home. Accordingly, court-ordered placement of the children in the home of the alienated parent is not feasible. However, if the children remain in the home of the alienating parent, there is no hope for reconciliation with the targeted parent. In such situations, I recommend the transitional-site program (17, 19) as a step toward residence in the home of the alienated parent.

Children in the moderate and severe categories need to be treated by a therapist who is knowledgeable about the special techniques necessary for the treatment of PAS children (17, 19). Therapists who are not familiar with these special techniques are not likely to be helpful to them.

## **THE CENTRAL QUESTION: SHOULD PAS CHILDREN BE COERCED?**

### **The Position of Mental Health Professionals**

The question regarding whether PAS children should be forced to visit and/or reside with the alienated parent has been a central one for those working with these children. Mental health professionals have generally taken the position that it is antitherapeutic to force children to do things that they profess they do not want to do and that various forms of psychopathology can result from such coercion. The general approach has been: evolution rather than revolution, i.e., to slowly and meticulously "work through" the problems that are inhibiting the children from enjoying once again a loving relationship with the alienated parent.

Most (but not all) therapists who treat PAS children recognize the importance of reestablishment of the healthier bond with the alienated parent, but believe that the best approach to this goal is to slowly over time help the children gain insight into the factors that were operative in their alienation and to then achieve rapprochement with the targeted parent. My experience has been

that this *rarely* happens, especially for children who have reached the moderate and certainly the severe levels of PAS. Generally, I am a strong proponent of the evolution versus revolution approach and recommend it in just about all of the books I have written on therapeutic techniques ([23-33](#)). I am deeply committed to the evolution approach and have utilized it since the beginning of my career. However, my experience has been that such an approach just does not work for PAS children. In fact, it makes them worse, because time is on the side of the alienating parent and the more time the therapist spends (or more accurately *wastes* ) utilizing this traditional psychotherapeutic approach, the greater the opportunities the alienator has to indoctrinate the children against the targeted parent.

Therapists who work with PAS children must be comfortable with alternative methods of therapy, therapy that involves an authoritarian approach to the treatment. They must be able to say to an alienating parent: "If the children are not dropped off at your ex-spouse's home by 5:00 p.m. this Friday, I will report this to the court and recommend the sanctions already described in the court order." They must be comfortable working without the traditional confidentiality so necessary to standard treatment. They must be comfortable threatening alienating parents as well as children that there will be consequences if they violate the court-ordered visitation program. Such therapists must be comfortable with confrontational approaches, the purpose of which is to deprogram PAS children. They must recognize that doing what children profess they want may not be in their best interests. What is in their best interests in PAS cases is that the children be forced to visit with the alienated parent. Therapists who are not comfortable with what I call "threat therapy" should not be working with PAS families.

Therapists who are not willing to make these shifts are not likely to be helpful to PAS children. My experience has been that mental health professionals resist strongly such a shift in their therapeutic approaches. One factor relates to the common resistance to do something that is completely at variance with what one has been trained to do since the first day of training. Such recommendations, therefore, are typically viewed with suspicion. In addition, my experience has been that many people who gravitate toward the field of psychotherapy are somewhat passive in their personality structure and not comfortable with more assertive approaches to dealing with the problems of the world, both inside and outside of the consultation room. Such individuals just *cannot* make the recommended shift. Accordingly, such people should not work with PAS families. We cannot be "all things to all people." No therapist has the personality type to work with every category of psychiatric disturbance. Each of us, preferably early in training, should learn about those patients with whom we are comfortable working and those with whom we are not.

Unfortunately, a career in therapy also attracts people who are obsessive doubters, people who have difficulty making decisions. Such people are happy to spend years (literally) weighing the pros and cons of any particular action. The deliberative process becomes an end in itself. Such obsessive doubters gravitate toward the field of psychotherapy because it involves meticulous weighing of *all* the contributory factors and endlessly discussing the pros and cons of any issue--before taking action. Such individuals appear to be quite content never coming to a conclusion, although they are ever professing that they are working with their patients toward closure. And this personality quality (or more accurately *defect* ) is seen both inside and outside the consultation room. Such people should not be working with PAS children. They will make them worse and they will do just what the alienating parent wants them to do, mainly nothing.

## The Position of Judges

My experience has been that judges are extremely reluctant to issue the kinds of orders necessary for the optimum treatment of PAS children in the moderate and severe categories. The legal process is intrinsically a slow one. The founding fathers guaranteed us a "speedy trial" in the U.S. Constitution. That document was written and signed in 1789. I have not *once* seen a speedy trial in the context of a child-custody dispute. I have seen speedy issuance of restraining orders, often without proper collection of evidence. I have seen speedy decisions following a sex-abuse accusation, again without proper collection of evidence. But I have *never* seen a speedy decision made in a child-custody dispute. The usual duration of such cases that have come to my attention has been two to three years between the time of the initiation of the dispute and the time of the court's decision. By that time, the children are significantly older and the decision is made on the basis of data that may no longer be relevant. All this works for the alienator, because the more time the alienator has access to the children, the more deeply entrenched will become the PAS campaign of denigration. By the time the children do come to the attention of the court, they will protest vigorously any kind of a court-imposed program that might lead to reconciliation with the alienated parent.

Another problem with the courts is the failure to make decisions that involve significant change in the lives of the children. The orientation is to maintain the status quo. On the one hand, such reluctance may serve well many children because custodial transfer often involves a change in domicile, a change in neighborhood, school, and network of friends. On the other hand, such considerations must be weighed against the special needs of PAS children. If there is to be any hope of their reestablishing a relationship with the targeted parent, PAS children *must* spend significant time with him (her). They must have *living experiences* that will demonstrate that the PAS parent is not noxious and/or dangerous. My experience has been that most judges do not appreciate that the arguments in favor of transfer for PAS children generally outweigh the arguments for maintaining the status quo. It is my hope that studies such as this will provide courts with evidence that will bring about more such transfers when warranted, i.e., Plan B for the moderate cases and transfer (via a transitional site) in the severe cases.

With regard to judge's ordering therapy, there is generally no problem getting judges to follow the recommendation of a mental health professional that an individual be in treatment. This is the in-vogue thing to do, and judges that do not profess a respect for therapy may be considered out of touch with the latest trends. Furthermore, courts are often happy to order therapy, because it shifts somewhat the responsibility for doing something constructive and useful into the hands of another person. Accordingly, ordering therapy can justifiably be viewed as a judicial "cop-out" in many cases. It is a far easier, and even safer course than ordering custodial transfer, and/or various restrictions and even sanctions for the alienating parent. Courts, in their eagerness to order treatment, often make little if any discrimination among therapists. Courts traditionally will order "therapy" without giving any consideration to who the therapist is and whether or not that therapist has any knowledge or experience working with PAS children. The assumption is often made that any therapist will do and that most therapists know what to do with any patient who is sent their way. PAS children need therapy with a therapist who is knowledgeable about the special techniques necessary for the treatment of PAS children. Because, at this point, there are so few therapists who have this special knowledge, the likelihood of the children receiving proper treatment is very small.

Another problem with the courts is their failure to implement the aforementioned sanctions

program. Courts will, on occasion, change custody when it recognizes relentless PAS programming. My experience has been, however, that such transfer is uncommon and nothing else is done (other than empty warnings and threats) to discourage or restrict further the relentless programming. As mentioned, I generally recommend a hierarchy of warnings to the alienating parent, from posting a bond to short-term incarceration. My experience has been that courts are *extremely* reluctant to even warn alienating parents about such sanctions--let alone implement them. Unfortunately, my experience has also been that even when judges do warn alienating parents that violating court orders places them in contempt of court, and they run the risk of the implementation of one or more of the aforementioned sanctions, nothing happens. Typically, the courts do not follow through with such threats (in the rare cases in which they are made). The alienators know this. In fact, they know this well, and they know that they can violate such court orders with impunity. Accordingly, they ignore the court orders and ignore the warnings of sanctions. I am not saying that courts never impose such sanctions; I am only saying that they rarely do so in my experience and the experiences of colleagues of mine in the field.

Then, there is the issue of perjury. I have seen alienators consciously and deliberately fabricate on the witness stand and do so year after year. (As mentioned, some litigated custody disputes last for years.) And I am sure that in many such cases the court was aware of the fact that the alienating parent was being deceitful. Yet, I have never seen a case in which a court has in any way punished such a parent for perjuring themselves on the witness stand. I have seen courts punish such perjurers in other ways, such as transferring custody; but I have never seen a court impose a punishment for perjury per se. Accordingly, PAS indoctrinators know well that they can lie on the witness stand with impunity, and they try to get away with as much as they can. They are ever "pushing the limits," ever testing to see how far they can go with their violations of the court orders. Accordingly, they continue to perjure themselves--often with the full knowledge and support of their attorneys.

The predictable reluctance of the court to take action in all of the aforementioned areas is one of the important reasons why the PAS is such a widespread disorder. Yet, I believe that things are improving, but much too slowly. It is my hope that articles of this kind will play a role in mobilizing courts to do what is necessary for PAS children, and do it quickly.

### **Follow-up Studies**

One of the arguments that I am often met with in courts of law regarding my recommendations for custodial change and/or the sanctions program is that I do not have follow-up studies to support my recommendations. This is true, but not surprising, because the PAS is a relatively new phenomenon, an outgrowth of the shift by courts from granting mothers primary preference in custody disputes to using gender-blind criteria in such decisions ([3](#), [6](#), [10](#)). When both parents became equal before the court regarding custodial preference, the children were then "up for grabs," and programming became intensified. It was in this atmosphere that PAS emerged as a common phenomenon. Follow-up studies have started to appear, and there is no question that more will appear in the future. Clawar and Rivlin ([34](#)), who conducted one of the earliest and what is probably still the most extensive study of PAS children state:

It is our opinion that one of the most powerful tools the courts have is the threat and implementation of environmental modification. Of the approximately four hundred cases we have seen where the courts have increased the contact with the target parent (and in half of these, over the objection of the children), there has been positive change in 90 percent of the relationships between the child and the

target parent, including the elimination or reduction of many social-psychological, education, and physical problems that the child presented prior to the modification.  
(p. 150)

Dunne and Hedrick (35) describe 16 cases of moderate to severe PAS. The court ordered custodial change and/or limitation of contact with the alienating parent in three of these cases. In all three cases, the PAS was eliminated. In the other 13 cases, the court did not order custodial change nor restriction of access to the children by the alienating parent. Traditional psychotherapy was, however, provided. None of the children in the latter group were helped with their alienation.

Lampel (36) described 7 alienated children and compared the outcome for those forcibly separated from the alienating parent to those who were not. She did not use the term PAS, but her patients were clearly suffering with this disorder. The only child whose PAS symptoms were reduced markedly was the one who was placed with the alienated parent. These are the only three studies that I know of at this point. There may be more, but they have not come to my attention. At this point, then, I know of no study that supports the conclusion that severely alienated children are better off staying with the alienating parent.

## **FOLLOW-UP STUDIES WITH MY OWN PATIENTS**

### **Patient Selection**

Selected for this study were cases in which I was personally involved. There was no case in this study in which I did not have some direct involvement. In many cases I had the opportunity to conduct full evaluations of both parents and the children, both individually and in various combinations. In some I had attempted to reach the goal of full family interviews, but was thwarted by one parent and/or the legal process. In some, I served as a consultant. In such cases my conclusion that a PAS was present was arrived at only after review of enough material (often voluminous) to enable me to come to the conclusion that a PAS was present and that custodial transfer or restriction of access to the alienating parent was justified. I testified directly in many of these cases. In some my evaluations and recommendations were submitted to clients and attorneys, but settlements and agreements were made, precluding thereby my testifying in court. In a few, the parties were patients of mine, which generally precluded my direct involvement in the litigation. It is important for the reader to note that in most of the custody cases I have evaluated I recommend that custody remain with the primary custodial parent, even when that parent may have been a PAS indoctrinator. It is only in the moderately severe and severe cases of PAS that I recommend reduction of access to the alienator and/or custodial transfer. The cases in this study, then, represent only a small percentage of my PAS custody evaluations.

The only cases selected for this study were those in which the following three conditions were satisfied:

1. I personally had the opportunity to be directly involved in the case to the degree that I could come to a reasonable conclusion regarding whether PAS was present and what would be the proper recommendation for the court.
2. Custodial transfer or restriction of time with the alienator was warranted because of the tenacity of the alienator and/or the severity of the PAS symptomatology of the children.



3. Follow-up information was available, generally by follow-up telephone call or letter. All follow-up interviews were conducted by the author personally, because I had been originally involved in the case and therefore I considered it proper for the purposes of the study that I personally conduct all follow-up interviews. Cases in which such contacts were not possible were not included in the study.

Not included in this study were PAS cases in which I did not recommend custodial transfer or restriction of the children's access to the alienating parent. These represent the majority of all PAS cases that have come to my attention. Custodial transfer and/or restriction of the children's access to the alienator is only recommended in those cases in which the PAS in the children is severe or rapidly going in that direction and/or the alienator's tenacity is so great that it is unlikely that it will be reduced following the legal settlement of the custody dispute. Also not included in this study were families in which a parent who was genuinely abusing falsely claimed that the children's alienation was the result of PAS indoctrinations by the other parent. These are abuse cases, not PAS cases. Such cases are becoming increasingly common (17) but were not the focus of this study, especially because I did not find PAS to be present, but rather bona fide abuse.

### **Who Was Called for Follow-up Data?**

In all cases the person who was called for follow-up information was the alienated parent. These were the people who had been victimized by the PAS indoctrinations, who had suffered most, and who, I suspected, would be most receptive to speaking with me about their experiences. This proved to be the case. I did not call alienating parents because I suspected (and I believe with justification) that they would not be fully cooperative with me with regard to providing accurate information. Nor did I believe that they would be receptive to spending time with me on the telephone in order for me to get proper data. I will discuss this issue further in the section "Limitations of the Study."

### **What Questions Were Asked?**

In the course of the inquiry I posed questions in 3 areas, although not necessarily in this order:

1. Are the children still alienated from you?
2. Describe the degree of alienation. (Attempts were made here to assess whether the alienation was in the mild, moderate, or severe category.)
3. How long has (have) the child(ren) been alienated?

## **THE FINDINGS**

For the purposes of the final statistical tabulation (Table 3), the data collected from each case is formulated into yes-no responses to the two questions:

Custody changed or alienator's access reduced (**Yes** or **No** )

PAS symptoms reduced or eliminated (**Yes** or **No** )

For the purposes of this report, only limited information is provided about the clinical details of each case. Focus is placed on the PAS category, my recommendations, the court's decision, and the follow-up effects on the children of the court's decision. Each case number refers to a

PAS child. If there was more than one PAS child in a family, then each child is designated his (her) own case number. This breakdown was necessary because there were sometimes different outcomes for different children in the same family. This study provides findings on 99 PAS children from 52 families.

|   | PAS SYMPTOMS REDUCED OR ELIMINATED | PAS SYMPTOMS NOT REDUCED OR ELIMINATED | N  |
|---|------------------------------------|--|----|
| CUSTODY CHANGED OR ALIENATOR'S ACCESS REDUCED         | 22                                 | 0                                      | 22 |
| CUSTODY NOT CHANGED OR ALIENATOR'S ACCESS NOT REDUCED | 7                                  | 70                                     | 77 |
| N   | 29                                 | 70                                     | 99 |

**PAS Symptoms as a Function of Alienator's Access**  
**Table 3**

**Case No. 1**

The father, a severe psychopath, was relentlessly indoctrinating a PAS in their son. The father had been incarcerated on three occasions and was brought up on criminal charges on at least four other occasions. The child was in the moderate category of PAS, but there was strong evidence for progression to the severe level if something was not done to remove the child completely from the father's access, so compulsive and relentless a programmer was he. He was ever serving as a model for a psychopath and was ever trying to induce psychopathic behavior in the child.

I recommended that the mother be designated primary legal and custodial parent with the child's having absolutely no contact with the father for at least five years, mainly because he was actively and passively training this child to become a psychopath. I suggested no contact whatsoever, by any means whatsoever, including telephone, mail, e-mail, fax, and any other mode of communication--at least for the next five years.

*The Court's Ruling* : The court agreed fully with *all* of my recommendations and placed a restraining order on the father for five years. The order authorized immediate arrest of the father if he was even attempting to have any contact at all with the child.

*Follow-up* : One year. The father had had no contact with the child, and the boy was completely free of PAS symptomatology.

No. 1 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 2 and 3**

The mother, and her new lover, who was a blatant psychopath, were attempting to alienate her children from their father. The paramour had a criminal record, had been incarcerated on two occasions, and was on probation at the time of his affair with the mother. They were programming the two children relentlessly against their father. In spite of this, the children were only in the mild level of PAS symptomatology, mainly because of the strong, healthy bonding they had with their father. This served as an antidote to the development of severe types of PAS symptomatology. There was absolutely no evidence that the mother and her paramour would cease and desist from PAS indoctrinations. I testified that primary physical and legal custody should be given to the father. I recommended supervised visitation for the mother (to ensure that her paramour would not have access to the children) and a restraining order for the paramour (to protect the children from any contact whatsoever with the paramour).

*The Court's Ruling* : The court agreed and implemented the aforementioned recommendations.

*Follow-up* : Five months. Following implementation, there was an immediate clearance of all the children's PAS symptomatology. The mother and her lover complied completely with the court's order that the paramour have no contact whatsoever with the children.

No. 2 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 3 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 4 and 5**

The mother induced in the children severe PAS symptomatology against their father. After lengthy preparation, I did not testify because the father, recognizing the futility of his attempts at reconciliation through litigation, gave up pursuing custody. Nothing had happened in the courtroom to give him any hope that the judge would transfer custody or even force visitation. (He was probably right.)

*The Court's Ruling* : Prior to the time that the father ceased litigating, the court had refused to even consider custodial transfer because of the high level of antagonism the two children exhibited toward their father. The court had ordered joint legal custody and primary physical custody for the mother. The mother violated the court-ordered visitation with impunity and knew well that the judge would not consider her to be in contempt of court nor impose sanctions.

*Follow-up* : Six years. At the time of follow-up, the father had not had any contact at all with the children, even verbal, and had given up entirely any hope of having any future contact with

them. Yet, he was still required by court order to pay for their college tuition and expenses. (This is the usual situation in my experience.)

No. 4 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 5 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 6 and 7**

The mother came for consultation for possible help regarding reconciliation with her two sons, both in their late 20s, who had been severely alienated from her for approximately 18 years. The mother had been primary custodial parent. From everything I could learn from the mother, I was convinced that she had been completely dedicated as the children's primary caretaker during their formative years. Her husband had been a busy businessman, whose work often required him to be away from the home for two-to-three weeks at a time. There was absolutely no evidence that she had ever been neglectful or abusive to the children yet, the father, a very powerful and compelling person, had convinced the boys that the mother was a despicable human being. The mother had no conviction that the court would disbelieve the boys and be convinced that they were programmed. The two attorneys she had at the time were similarly pessimistic. Accordingly, she gave up and hoped that some day the boys would come to appreciate what had happened to them. She did, however, continue to send greeting cards and small presents for special events.

*The Court's Ruling* : There was no court order for transfer.

*Follow-up* : Nineteen years. Both sons, now in their late 20s, are still severely alienated. The mother's letters and calls were never returned. Mother was still hoping for eventual reconciliation.

No. 6 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 7 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 8 and 9**

The mother, a relentless and severe alienator, induced moderate PAS symptoms in their two children. The father's dedication and deep involvement with the children served as an antidote to the PAS and helped prevent its progressing down to the severe level. Because there was absolutely no hope that the mother would cease and desist from programming the children against the father, I recommended in my testimony that the father be given primary physical and legal custody.

*The Court's Ruling* : The court went along with my recommendation.

*Follow-up* : Four years. The children were free from PAS symptomatology with the exception of the two-day time frames after returning from their mother. I did not consider their symptoms at that point to be manifestations of separation anxiety because they included many of the borrowed-scenario phenomena. Furthermore, they did not exhibit such symptoms during the first two days after being with their father. These symptoms, however, were a vast improvement over the ongoing moderate PAS symptoms the mother had been previously successful in inducing in the children.

No. 8 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 9 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case No. 10**

The mother was inculcating in the daughter a PAS against the father. Also present was a spin-off false sex-abuse accusation. The mother's new paramour provided the mother with strong support for both the PAS indoctrinations and the false sex-abuse accusations. The child's PAS symptomatology was in the mild to moderate range. I testified that there was no sex abuse and that the father should be designated the primary custodial parent because of the mother's relentless PAS indoctrinations.

*The Court's Ruling* : The court went along with my recommendation and ordered primary custody to the father, with reasonable but limited visitation with the mother.

*Follow-up* : Three-and-a-half years. The child was doing well with the father and visiting with the mother. There was a marked reduction in PAS symptomatology, but there were still occasional, mild PAS symptoms present, especially after visits with the mother.

No. 10 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 11 and 12**

The mother was successful in producing severe PAS in both daughters. I testified that primary physical and legal custody should be transferred to the father.

*The Court's Ruling* : The court ignored my testimony and gave primary physical and legal custody to the mother.

*Follow-up* : Four-and-a-half years. The two children were still severely alienated from the father and had practically no contact with him at all since the court's decision.

No. 11 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 12 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case Nos. 13 and 14**

The mother was inducing a PAS against the father in both their son and their daughter. In both children the PAS was mild because of the strength of the father's bonding with them. In my testimony I recommended primary custodial transfer of the son to the father and recommended that the daughter remain living with the mother. I suggested also that the mother be warned that if her indoctrinations did not cease, then the daughter would also go to live with the father.

*The Court's Ruling* : The court did not go along with my recommendations and gave primary custodial status of both children to the mother.

*Follow-up* : Three years. The children were still living with the mother and exhibited moderate PAS symptomatology when in the mother's home, e.g., no telephone calls returned, no e-mail messages returned, no acknowledgement of presents. When they visited with their father, their PAS symptoms diminished after a few days and all would go well. This is the result of their strong bonding with their father, which serves as an antidote to the PAS.

No. 13 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 14 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case No. 15**

The mother, a fanatically religious paranoid, inculcated a severe PAS in their son. At the time of my first involvement, there had been six years of severe alienation from the father who saw the child on only a few occasions during that time span. I recommended custodial transfer to the father. I never testified because by the time I was to do so, about a year after my initial involvement, the father gave up the quest as a lost cause (and he was probably right).

*The Court's Ruling* : The court ruled that the mother should remain primary custodial parent.

*Follow-up* : Two-and-a-half years. Eight-and-a-half years after the onset of the PAS, the child was still having absolutely no contact at all with his father.

No. 15 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case Nos. 16, 17, and 18**

The mother and father had a 50/50 joint physical and custodial arrangement. The father was successful in inducing a moderate to severe PAS in all three children. The mother described her weeks with the children as "living hell." I recommended in my testimony that the mother have primary physical and legal custody with severely restricted access by the father, a relentless PAS programmer.

*The Court's Ruling* : The court ruled that the mother have primary physical and legal custody with an extremely restricted visitation schedule for the father.

*Follow-up* : One-and-a-half years. Two of the three children were completely free of PAS symptomatology. One child exhibited mild PAS symptoms.

No. 16 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 17 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 18 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 19 and 20**

The mother was successful in inducing a moderate level PAS against the father in the two children. I testified that there should be reduction of the mother's access to the children.

*The Court's Ruling* : The court concluded that there was no PAS and continued with the father's traditional visitation program.

*Follow-up* : One year. The younger child exhibited mild PAS symptoms, but the older child still continued to exhibit moderate level symptomatology.

No. 19 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 20 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 21, 22, and 23**

The mother was successful in inducing a severe PAS against the father in all three children. In addition, the mother had programmed the daughter to claim falsely that her father had sexually abused her.

*The Court's Ruling* : This was a criminal case because of the sex-abuse accusation. I testified in the preliminary hearing on the PAS, but I did not testify before the jury. The judge ruled that the PAS diagnosis could not properly be admitted into testimony and so the jury never heard about it. It may be of interest to the reader that this testimony was provided approximately eight months before my testimony in a Frye Test hearing in which the court *did* rule that the PAS had reached the level of general acceptance in the scientific community that warranted admissibility in courts of law (37). The father went to jail.

*Follow-up* : Eight months. The children had not communicated with their incarcerated father,

who was serving a seven-year sentence.

No. 21 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 22 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 23 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 24, 25, and 26**

The mother was successful in inducing mild to moderate PAS symptoms in the three children against their father. I testified and recommended custodial change to the father because of the mother's relentless programming of the children.

*The Court's Ruling* : The court agreed that there was a PAS and transferred primary custody to the father. The mother was successful, however, in getting the ruling stayed by the appeals court so that the children remained in the mother's primary custody.

*Follow-up* : Sixteen months. There was a gradual reduction of the children's PAS symptoms with their increasing recognition of the mother's alienating behavior. There was still some residua, however, especially in the child who was in the moderate category. My conclusion here was that there would have been less PAS symptomatology had the court-ordered change in primary custody gone into effect. This is a case, then, in which the custodial change did not take place, and the children got better nonetheless.

No. 24 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

No. 25 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

No. 26 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 27 and 28**

The mother had induced a moderate PAS in their children against the father. This was also a criminal trial because of the father's refusal to pay the mother alimony while the children were alienated from him. This was an unusual forum for the adjudication for nonpayment, but the mother had brought her complaint to the prosecutor and he decided to press criminal charges against the father. I testified about the PAS and the justification for the father's feeling exploited when he was required to pay the mother alimony when she was programming the children against him. Although I testified that custodial transfer would be warranted in this case, I



understood that it was not within the power of the criminal court to order such transfer.

*The Court's Ruling* : The jury was convinced that there was a PAS in this family and that the father had not committed any crimes. However, the jury had no power to order a custodial transfer. At that point, the father had planned to go back to the family court to continue litigating.

*Follow-up* : Sixteen months. At the time of my testimony one child was 18 and the other 15. Within ten days of my testimony, the older boy, having learned from the newspapers and others that his father was exonerated, realized that he had been brainwashed by the mother, called his father, and became reconciled with him--even moving into his home. The following day, the daughter, following her brother, enjoyed a similar rapprochement with her father. It is important to note that had the children been much younger, the reconciliation probably would not have taken place, because the criminal court has no power to enforce visitation. But the ruling influenced the older child, and then the younger, to seek reconciliation with their father on their own.

No. 27 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

No. 28 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 29 and 30**

The mother was inducing a PAS in the two children. Both children exhibited mild PAS symptomatology, approaching the moderate. In my testimony, I did not recommend custodial transfer in this case, but reduction of the mother's parenting time with the children with the warning that if the PAS indoctrinations were not discontinued, then the court should seriously consider custodial transfer.

*The Court's Ruling* : The court ruled that there was no PAS and so did not issue any warnings to the mother.

*Follow-up* : Five months. The children were still visiting, but PAS symptomatology was getting worse. The father believed that the court's ruling "emboldened" the mother and he anticipated that the children would get worse, at which point he was reconsidering going back to court.

No. 29 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 30 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 31, 32, and 33**

The father had successfully indoctrinated severe PASs into all three children against the mother. At the time I became involved in the case, all three children had not seen the mother at all for two years. I testified, recommending forced visitation of the children with ultimate transfer of

custody to her.

*The Court's Ruling* : The court ruled that the children did not have to see the mother for at least two years and then it would reconsider the case.

*Follow-up* : Eight months. There had still been absolutely no contact between the mother and the children. Even telephone calls were refused by them. The mother finally concluded that the situation was hopeless, and I agreed with her, because the PAS was very severe and the father was an obsessive and relentless indoctrinator.

No. 31 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 32 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 33 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 34 and 35**

The mother induced a moderate PAS in their two children against the father. I recommended in my testimony that the court transfer primary custodial status to the father.

*The Court's Ruling* : The court transferred primary custody to the father, with supervised visitation with the mother every other weekend.

*Follow-up* : Three-and-a-half years. The children were still living with the father and exhibited no PAS symptomatology. The mother was exercising only about 25 percent of her visitation rights. We see here an example of my frequent observation that PAS parents are less committed to their children than they profess and often exhibit significant parenting deficiencies. In fact, inducing a PAS in a child would be a good example of this.

No. 34 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 35 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case No. 36**

The mother had inculcated a severe parental alienation syndrome in the one child of the marriage. At the time the father consulted with me, he had not seen his daughter in almost four years. At that time, he was representing himself (because he had run out of money) and argued that the court impose stringent restrictions on the wife unless she produced the child for visitation. I was consulted in this case, but did not directly testify.

*The Court's Ruling* : The court ruled that the father should have no visitation at all because his overtures and efforts to see his child were viewed as not in the child's best interests.

*Follow-up* : Two years. The father had had no contact at all with his daughter and all attempts to communicate with her by telephone, mail, etc. were 100 per cent rebuffed. By the time of the follow-up, then, there had been six years of complete alienation.

No. 36 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 37**

The mother had induced a moderate PAS in the daughter. When I was invited into the case, the PAS symptoms had been present for approximately three years. Because the mother was relentless and there was very little likelihood of her reducing her PAS indoctrinations, I recommended transfer of custody to the father.

*The Court's Ruling* : Initially, the court did not go along with my recommendations and ruled that the child should remain living primarily with her mother. PAS symptomatology became progressively worse. Two years later, the daughter was so alienated from the father that she appeared to be progressing rapidly into the severe level of PAS. The father returned to court requesting, once again, custodial transfer. At that point, the court transferred custody to him.

*Follow-up* : Fourteen months after custodial transfer. The child was completely free of PAS symptoms. Interestingly, the mother, after losing primary custody, showed little interest in the child and did not take advantage of the visitation awarded to her by the court. This too played a role in the dramatic reduction of the child's symptoms. We see here yet another example of the parental deficiencies seen in the PAS indoctrinator.

No. 37 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case No. 38**

The mother had induced a severe PAS in their son against his father. In addition, she induced a false sex-abuse accusation. When I first became involved in the case, the father was seeing his son two hours a week under supervised visitation. This had been going on for two years. In my evaluation, I found the mother to be paranoid and recommended transfer of custody to the father with restricted visitation for the mother. I also testified that there was no evidence for sex abuse and that the boy's sex-abuse accusation was the product of their mother's paranoid delusional system.

*The Court's Ruling* : Because the court ruled that there was no sex abuse, supervised visitation was suspended. The court also concluded that there was no evidence for PAS in the child nor paranoia in the mother. The court ruled that the father could not visit with the child until the child himself decided he wanted to do so.

*Follow-up* : One year. The boy, then 12, had still not decided to visit with his father. The child's severe PAS symptoms had become even more deeply entrenched.

No. 38 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

**Case No. 39**

The mother was at the moderate level of PAS programmers of the three-year-old daughter. (As mentioned, programmers may also operate at mild, moderate, or severe levels, but these are often more difficult to differentiate than the child's levels of PAS symptoms.) At the time of my testimony, the child was in the mild level of PAS symptomatology. I recommended that the court turn over primary custody to the father with traditional visitation to the mother in order to reduce her access to the child.

*The Court's Ruling* : The court did just the opposite and gave the mother primary custody with traditional visitation to the father. The court also gave her permission to move approximately 125 miles away from the father.

*Follow-up* : Six years. Two years after I testified and again four years after I testified, the father went back to court with the same complaints, and once again the court refused to expand his visitation, let alone transfer primary custody to him. At the time of follow-up, over six years after my testimony, the situation was status quo. There had been no reduction in the child's mild PAS symptomatology. Nor had there been any reduction in the mother's PAS indoctrinations. The child still exhibited mild PAS symptoms and the mother was still a moderate programmer. The father's strong bonding with the child served as an antidote to the development of more serious PAS pathology.

No. 39 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

**Case No. 40**

The mother was relentlessly accusing the father of both physical and sexual abuse of their son. She was also accusing him of starving the boy. This had resulted in mild to moderate PAS symptoms. I did not provide direct testimony in this case, but consulted with the father and his attorney.

*The Court's Ruling* : The court ordered primary custody to the father, with traditional weekend visits with the mother. The mother did not cease, however, in her attempts to indoctrinate the child against the father. One year later, the court ordered supervised visitation for the mother.

*Follow-up* : Eight months. The supervised visitation had the effect of eliminating entirely the child's PAS symptomatology.

No. 40 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

**Case Nos. 41 and 42**

The mother, a moderate alienator, had been successful in producing a moderate PAS in their son and a mild PAS in their daughter. I provided a consultation in this case, but did not provide

testimony.

*The Court's Ruling* : The court did not support the father in his attempts to gain primary custody or, as a second choice, to reduce the mother's access to the child.

*Follow-up* : Three years. The son had progressed to the severe level of PAS and had not seen his father in a year and a half. The daughter was seeing her father in reduced visitation and was exhibiting mild PAS symptomatology. The mother was still in the moderate category of PAS indoctrinator.

No. 41 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 42 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 43**

The mother, a moderate-severe PAS programmer, had induced a moderate PAS in their son. At the time of my consultation (I did not provide testimony in this case), the child had become progressively more alienated over the previous three years.

*The Court's Ruling* : Subsequent to my consultation, the court ordered a traditional visitation schedule for the father, but the mother, in violation of court orders, continued with her campaign of exclusion and denigration of the father. The court did absolutely nothing about the mother's violations of its visitation orders. Like most PAS indoctrinators, the mother knew that she could ignore the court orders with impunity.

*Follow-up* : Three years. The child progressed to the severe level of PAS. About two years before the follow-up call, the father could tolerate no longer his 13-year-old son's rejection of him and denigration during the rare moments when they did get together. He decided to give up trying to reconcile with his son and hope that his son might someday initiate contact. He has not seen his son since.

No. 43 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 44 and 45**

The father and his new wife induced a PAS in the two daughters of the father's first marriage. I did not testify in this case, but provided consultation.

*The Court's Ruling* : The court ordered custodial transfer to the father because the judge believed that the girls' PAS allegations were valid descriptions of the mother. At the time of the court's decision, the alienation was in the moderate range and was of two years duration.

*Follow-up* : One year. The children's alienation progressed to the severe range, and the mother had had practically no contact at all with them for one year.

No. 44 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 45 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 46 and 47**

The mother, who was basically neglectful and abusive, was also in the moderate level of PAS indoctrinator. The two girls exhibited only mild PAS symptomatology, mainly because the father's and stepmother's strong bonding with the children served as an antidote to the mother's PAS indoctrinations. I testified that the mother was abusive and a PAS programmer. I recommended that the father get primary legal and physical custody and that there be a limited visitation program for the mother.

*The Court's Ruling* : The court ruled that the mother was neither abusive nor a PAS indoctrinator and ordered restricted visitation for the father because of his allegedly false accusation that the mother was an abuser and a PAS indoctrinator. The court considered the children's animosity against the father justified and placed an *indefinite* restraining order against the father, restricting him from having any contact at all with the children. This was in spite of my in-depth evaluations which provided strong evidence that the mother was both abusive and a PAS indoctrinator.

*Follow-up* : Six months. The children progressed to the severe level of PAS. They called the father only rarely, and then only to persecute him over the telephone. The mother could be heard in the background prodding the children. With expanded contact with the mother, there was an increase in the children's PAS symptomatology. The children were completely alienated from the father and initiated contact only to persecute him. They went from a mild, to moderate, to very severe PAS very quickly after the court's decision.

No. 46 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 47 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 48**

Even prior to the separation, the mother was excluding the father from involvement with their child. These exclusionary maneuvers were intensified after the separation, to the point where the mother was successful in inducing a severe PAS in their daughter. I served as a consultant in this case. I did not testify.

*The Court's Ruling* : The court did not order forced visitation for the child. Rather, it ordered her into therapy with a therapist who had practically no understanding of the PAS and no receptivity to learning about it.

*Follow-up* : One-and-a-half years. The PAS was still severe. It was now two years since the

father had visited with his daughter in his home. The only time had had seen his daughter in the last two years was in the occasional joint sessions with the therapist, during which she would say nothing to her father but glare at him and pour forth profanities.

No. 48 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case No. 49**

The mother had been successful in inducing in their daughter a mild to moderate PAS against the father. The mother also programmed their daughter into professing a false sex-abuse accusation. The mother was also asking the court's permission to move to a distant state. I testified that there was no sex abuse and that the mother was inducing a PAS in the child. I recommended that the mother maintain primary custody only if she 1) remained living in the area and 2) ceased and desisted from her PAS indoctrinations.

*The Court's Ruling* : The court ruled that there was no PAS, but refused to rule on the sex-abuse issue. However, the court also ruled that the father should have supervised visitation once a week for three hours. The supervision was not to protect the child from sex abuse, but to protect the child from the father's anger, which was certainly justified, but not inordinate considering the circumstances. At the time of my testimony the child had been alienated from her father for one year.

*Follow-up* : Six years. The mother had moved to the distant state. The father was still seeing the child once a week for three hours under supervision. The child refused to touch her father, was generally cold and aloof, and exhibited moderate to severe PAS symptomatology.

No. 49 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case No. 50**

The mother was successful in inducing a moderate PAS in the daughter. I testified that the father, because of the mother's relentlessness, should be designated the primary custodial parent.

*The Court's Ruling* : The court ruled that the mother should remain the primary custodial parent and denied that there was any PAS present.

*Follow-up* : Four years. Over the ensuing years, there was a fluctuation in PAS symptomatology between the mild and moderate levels. After the mother moved to a greater distance, the PAS progressed to the severe level. At the time of the follow-up conversation, the father had not seen the child in four months and was very dubious about when he would see her again.

No. 50 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case Nos. 51 and 52**

The mother was successful in inducing a severe PAS in both daughters. She also programmed the older girl to claim that she was sexually abused by her father, when there was absolutely no evidence for such. The overzealous social worker at the child protection service joined the mother in the campaign against the father. I served as a consultant in this case and did not testify.

*The Court's Ruling* : The court ruled that the father did indeed sexually abuse the older girl and ordered that the father have no contact with either of the girls indefinitely.

*Follow-up* : Two years. The father had had no contact at all with his daughters for two years and was still having trouble resigning himself to the fact that his relationship with them would probably be permanently severed.

No. 51 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 52 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 53**

Following the announcement of the separation, there was a two-year period during which both parents were living in the home together because neither would leave (on the advice of attorneys). The father was successful in inducing a moderate to severe PAS in their 12-year-old son. I served as a consultant in this case.

*The Court's Ruling* : The court did not accept the PAS diagnosis and ruled that the boy's animosity was justified and that the mother should leave the home.

*Follow-up* : One year. Moderate PAS symptomatology still existed. There was no diminution.

No. 53 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 54, 55, and 56**

The father was successful in inducing a severe PAS against the mother in two of the three children. I did not provide testimony in this case, but served as a consultant.

*The Court's Ruling* : The court ruled that the children should remain in the primary custody of the father and ordered family therapy.

*Follow-up* : One year. The children's symptoms were even worse than before, causing the mother ongoing grief during the course of their visits to her home. By that time the third child was already exhibiting moderate-level PAS symptoms, having identified with the older siblings (a very common type of progression for the PAS)

No. 54 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**



No. 55 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 56 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 57**

The mother was successful in inducing in their daughter a severe PAS against the father. In addition, there was a false sex-abuse accusation spin-off. The child's therapist vigorously supported the mother in the sex-abuse accusation and testified as such. I did not provide testimony in this case, but served as a consultant.

*The Court's Ruling* : The court denied that there was a PAS present, concluded that sex abuse had taken place, and ordered supervised visitation for the father. Soon thereafter, the mother and child disappeared completely.

*Follow-up* : Thirteen years. The whereabouts of the mother and child were completely unknown over the thirteen-year period. The father had consulted with me about a malpractice suit against the therapist.

No. 57 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 58 and 59**

The mother had been successful in inducing in the two girls a moderately severe PAS. I did not testify directly in this case, but my report was introduced into evidence. I recommended that primary custody remain with the mother, but that the court should force visitation of the children with their father. I also recommended that the mother be put on notice that if she did not cease and desist from the PAS indoctrinations that primary custody would be transferred to the father.

*The Court's Ruling* : The court ruled that there was a PAS in this case and that the children should be forced to visit with their father. The forced visitation schedule reduced significantly the children's exposure to their mother.

*Follow-up* : Two years. The girls did well with the forced visitation and there was a diminution in PAS symptomatology from the moderate to the mild level. However, because they were still living with their mother, they were still being indoctrinated.

No. 58 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 59 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 60, 61, and 62**

The mother, with the help of *her* mother, was successful in inducing moderate PAS symptomatology against the father in all three sons. Also, the oldest son claimed physical abuse by the father as a PAS spin-off. I did not do a clinical evaluation in this case, but served as a consultant.

*The Court's Ruling* : The court did not recognize the PAS and ordered the father to have restricted supervised visitation with the older son, believing that there was a reasonable danger that the father would abuse the boy. The court also ordered restricted visitation with the two younger boys, even though they did not allege physical abuse, in order to reduce the father's opportunities for abuse of them.

*Follow-up* : Two years. There was no improvement in the children's PAS symptomatology. They were still at the moderate level.

No. 60 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 61 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 62 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 63, 63, and 65**

The mother was successful in inducing in all three children a severe PAS against the father. I did not testify in this case, but served as a consultant.

*The Court's Ruling* : The court did not recognize the PAS and ruled that all family members go into treatment.

*Follow-up* : Six months. All three children's PAS symptomatology had gotten worse.

No. 63 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 64 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 65 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 66, 67, 68, 69, and 70**

The mother had been successful in inducing severe PAS symptomatology in the two oldest of the five children. The two oldest hadn't seen the father in a year at the time of my consultation. The three other children were showing signs of mild to moderate PAS, but were still visiting with

the father.

*The Court's Ruling* : The court did not recognize the PAS and ordered counseling.

*Follow-up* : Seventeen months. The father had still not seen the two older children and the three younger children were becoming progressively more alienated.

No. 66 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 67 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 68 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 69 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 70 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

#### **Case No. 71**

The mother had been successful in inducing in the son a moderate PAS. In addition, there was a false sex-abuse accusation spin-off. Prior to my testimony, there had been a five-month period during which the father was not permitted to see the boy at all and then, in the next few months, he had seen his son under supervised visitation a few hours a week. During the supervised visits, the child exhibited moderate PAS symptomatology. I testified that there was a PAS, that there was no bona fide sex abuse, and I recommended a 50/50 joint custodial arrangement. I also recommended that the mother be put on warning that if she continued with the PAS and/or sex-abuse accusations, I would be recommending transfer of custody to the father.

*The Court's Ruling* : The court implemented all the aforementioned recommendations.

*Follow-up* : Five years. The father stated that immediately following the court's ruling the child was brought to his house and "within minutes" was back to normal, and there has been no PAS symptomatology since. We see here a good example of how PAS symptomatology can evaporate in many cases under the proper circumstances. The shared custodial arrangement was still in force and the mother had ceased promulgating PAS and sex-abuse indoctrinations. I believe that my suggestions to the judge that the mother be warned that her access to her child would be reduced significantly if she persisted with her false accusations played a role in her pulling back.

No. 71 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

## **Case Nos. 72, 73, and 74**

The mother was a severe PAS indoctrinator of the three children. The primary way in which she attempted to alienate the children from their father was to secrete them from him and to repeatedly accuse him of sexually abusing the two older girls. The mother wanted to move back to the state where she was born and raised and was promulgating these accusations in the hope that they would justify her request. Although the children parroted the sex-abuse accusations, the strong bonding with the father served as an antidote to the development of anything more than occasional mild PAS manifestations. I testified that there was no sex abuse and that there should be a reduction of the mother's access to the children, with a warning that there would be further reductions if the physical and sexual abuse accusations did not cease and desist.

*The Court's Ruling* : The court ruled that there was no sex abuse. Prior to my testimony, the mother was the primary physical and legal custodial parent. The judge changed this to joint legal and physical custody with each parent receiving 50 per cent of parenting time.

*Follow-up* : Six-and-a-half years. The mother continued to periodically exclude the children from the father and relentlessly continued to promulgate false sex-abuse accusations. Over the years she had the children examined by sixteen sex-abuse examiners. Six months after my testimony, the father went back to court and was granted primary physical and legal custody, but this didn't stop the mother either, and two years later supervised visitation was imposed on her. At that point she moved back to the state where she was born and raised and has exercised only a small fraction of all her visitation opportunities. This had the result of reducing formidably the children's PAS symptomatology. We see here, once again, an example of how PAS indoctrinators basically have deficiencies in their parenting capacities.

No. 72 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 73 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 74 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

## **Case Nos. 75, 76, and 77**

The mother had been successful in inducing severe PAS symptomatology in the three children of the marriage. At the time I was invited into this case the father had been estranged from his children for four and a half years. I was invited to provide the father with support in his malpractice suit against the behavioral pediatrician who testified for the mother and supported the exclusion.

*The Court's Ruling* : The court did not force visitation, mainly because of the testimony of the behavioral pediatrician.

*Follow-up* : Seven-and-a-half years. Three years after my consultation (seven-and-a-half years after the cessation of contact) the father had had no contact at all with the three children.

No. 75 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 76 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 77 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case No. 78**

The father was successful in inducing a moderate (approaching the severe) PAS in their son. I served as a consultant and did not provide testimony. At the time of my consultation the PAS had been going on for five years.

*The Court's Ruling* : Over the years the court provided the father with progressive expansion, always using as its argument that the child was becoming increasingly antagonistic to the mother.

*Follow-up* : Seven years. Two years after my initial consultation the mother's access was reduced to about ten percent of the time (from 50/50 at the time of my consultation). Visits were now supervised, and the child was getting to close to reaching the severe level of PAS.

No. 78 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 79 and 80**

The father had been successful in producing a moderate to severe PAS in the older boy and a moderate PAS in the younger. At the time I was first consulted in this case, the children had been suffering with PAS symptomatology for two years.

*The Court's Ruling* : The court refused to order custodial transfer to the mother, nor would it order forced visitation. Rather, the court ordered therapy to improve the relationship between the mother and the children.

*Follow-up* : One year. The older son was still severely alienated from the mother and had had no contact with him. The younger son had now shifted into the severe PAS range and had had no contact with the mother for eight months. At the time of my call the court had decided to order another evaluation and to get a new therapist, because of the failure of the previous therapist to effect a reconciliation between the mother and the sons. This case provides yet another example of the common phenomenon in which courts naively order therapy and do nothing about reducing the alienator's access to the PAS children. This is exactly what the alienator wants, because the alienator can then predictably sabotage the therapy and gain more time for the indoctrinational process.

No. 79 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 80 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 81, 82, and 83**

The mother was successful in inducing a PAS in all three children, two boys and girl. In addition, she promulgated a false sex-abuse accusation, claiming that the father sexually abused their daughter. The wife reported the father to the prosecutor who instituted criminal action against him. When I first saw the father, he had been deeply alienated from his three children for nine months. The mother refused to cooperate in my evaluation and the court refused to order the children to participate. I evaluated the father and found no evidence for pedophilic tendencies. This report was helpful to him in the criminal trial.

*Court Ruling* : First, the court ordered no contact between the father and the allegedly abused child, and then, two months later, discontinued all visitation whatsoever with all three children. This order was to be reevaluated every six months.

*Follow-up* : Two years. In the two-year time frame the father still had not seen his children, with the result that there had been no contact for approximately 28 months. Each six-month renewal in the family court resulted in yet another six-month extension. Although no criminal action was taken, the family court refused to conclude that the father was no danger to his children.

No. 81 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 82 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 83 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 84 and 85**

There were two PAS children in this family, with different outcomes. The father had been successful in inducing a PAS in both daughters. At the time I became involved in the case the older girl was 12 and the younger girl 10. Both had been at the moderate level of PAS for approximately two years. I did clinical evaluations and submitted a report to the court.

*The Court's Ruling* : The court ruled that there was no PAS and that the children's animosity toward the mother was justified.

*Follow-up* : Two years. The younger child (Case No. 84) was still severely alienated from her mother, the last contact being six months prior to my call. This child's PAS then was approximately of 3-1/2 years duration.

The older daughter (Case No. 85), soon after the time of my evaluation began to appreciate that she was being programmed by her father. During the subsequent two years she repeatedly refused to return to her father's home and became progressively appreciative of the father's

attempts to indoctrinate her against her mother. We see here another example of a youngster who in the teens came to appreciate that she was being programmed and was able to remove herself from the influence of the alienating parent.

No. 84 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 85 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case No. 86**

The mother had been successful in producing a moderate level PAS in their daughter. In addition, she moved to a distant state primarily as an exclusionary maneuver. I served as a therapist in this case, my role being to help the youngster deal with the PAS that her mother had indoctrinated into her. In this case, I had access to the father and the child, but the mother refused to involve herself in treatment with me, even to have any telephone consultations with me.

*The Court's Ruling* : The court ruled, about three months prior to my entry into the case as therapist, that the mother had alienated the child against the father and gave primary physical and legal custody to the father.

*Follow-up* : One year. The child was still living with the father. However, each time she visited with the mother, she suffered an exacerbation of PAS symptoms to the moderate level. These were reduced to the mild level within a week after return to her father.

No. 86 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case No. 87**

The mother had been successful in inducing a moderate level PAS in their son. At the time I was consulted, the PAS was at the moderate level. I served as a consultant in this case.

*The Court's Ruling* : The court recognized the PAS and threatened the mother that if she did not produce the child in accordance with the visitation schedule she would be sentenced to community service. The court refused to even consider custodial change. However, the mother repeatedly violated the schedule and the court did *not* follow through. (A common situation, in my experience.)

*Follow-up* : Two-and-a-half years. There had been a one-year period during which the child was completely alienated from his father and there was no contact at all. During the six months prior to my follow-up, the child was occasionally visiting again, but exhibited moderate level PAS symptoms throughout the whole course of the visit. The change occurred after the judge became more convincing in his threats to punish the mother for her violations, but he did not spell out specifically what measures he would take for such transgressions. Nevertheless, she began to encourage visitation as a token acquiescence to the judge's threats in the hope that

such limited compliance would protect her from more stringent repercussions. The boy was still worse, however, than he had been at the time of my initial consultation.

No. 87 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 88 and 89**

The mother was successful in inducing a severe level PAS in the older girl and a moderate level PAS in the younger girl. The court refused to order my interviewing the mother and the children. At the time I first became involved in the case, to serve primarily as a consultant, the alienation had been going on approximately a year and a half.

*The Court's Ruling* : The court refused to recognize the PAS and refused to order the custodial transfer or forced visitation.

*Follow-up* : Two years. The older girl was still at the severe PAS level. The younger girl, during the previous six months, progressed from the moderate to the severe level. The older girl absolutely refused to speak with the father, and the younger girl, on occasion would speak with him briefly.

No. 88 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 89 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 90 and 91**

The mother was successful in indoctrinating a severe PAS into the older daughter, and a moderate PAS into the younger daughter. I had the opportunity to evaluate the father and the mother. However, the mother was successful, over a two-year period, in obstructing my interviewing the two girls. I did, however, provide testimony. At the time I entered the case the father had not seen the older daughter in six months, but was occasionally seeing the younger daughter.

*The Court's Ruling* : The court refused to even consider a transfer of custody and did not force visitation.

*Follow-up* : Two years. The older daughter still continued to exhibit severe PAS symptomatology and the younger daughter had progressed from the moderate to severe level. The father had not seen the younger daughter in almost a year.

No. 90 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 91 Custody Changed or Alienator's Access Reduced **No**



PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 92 and 93**

The father had been successful in inducing severe alienation in both daughters. When the mother called me for consultation, the children had been severely alienated from her for about six months, during which time she had practically no contact with them. I served as a consultant in this case.

*The Court's Ruling* : The court refused to force the children to visit and basically left it up to them.

*Follow-up* : One-and-a-half years. Up until three months prior to the follow-up telephone call the court still had not forced visitation. During all the preceding period the children were severely alienated from the mother. Three months prior to my call, the court insisted that the children visit or the father would be fined. The children then began to visit with the mother, using as their excuse that they were only visiting because they wanted to protect their father from this financial penalty. During the visits the children fluctuated from normal behavior to moderate PAS symptomatology, but the trend was in the healthy direction. This case not only demonstrates the salutary effects of forced visitation but the children's need for an excuse to visit. Finally, after two years, the court provided this excuse for them.

No. 92 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

No. 93 Custody Changed or Alienator's Access Reduced **Yes**

PAS Symptoms Reduced or Eliminated **Yes**

### **Case Nos. 94 and 95**

The father was successful in inducing a moderate level PAS in the twin boys. He was supported in this by his extended family network, especially his eight siblings, their spouses, and their children. Ethnic differences were clearly at the core of the alienation process. Specifically, the father and his enormous family network were extremely prejudiced against the mother and constantly denigrated her with ethnic slurs. This became a central element in the two boys' alienation from their mother. I served as a consultant in this case.

*The Court's Ruling* : The court did not recognize the PAS and did not order custodial transfer and/or any constraints on the alienating father. Rather, it ordered mediation.

*Follow-up* : Twenty months. The father did not cooperate at all with the mediator, who then removed herself from the case. Two subsequently appointed consulting psychologists knew nothing about PAS and recommended therapy for the family, but the father did not cooperate. At the time of follow-up the PAS symptoms had increased and were progressing toward the severe level. This case is yet another example of how mediation is of no value for PAS families and is generally used as a stalling maneuver by alienators. This case is yet another example also of how easily traditional therapy can be sabotaged by an alienating parent and thereby contribute to the perpetuation of the symptoms.

No. 94 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 95 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 96 and 97**

The mother had induced a PAS in each of the two children, an older girl and a younger boy. The older girl had served as the mother's assistant programmer for indoctrinating a PAS into her younger brother. The mother had secretly moved to another state and her whereabouts were unknown to the father for six months. I served as a consultant in this case.

*The Court's Ruling* : After two years of alienation the court ruled that the children should go into therapy. The mother made a mockery of the process and the children remained severely alienated.

*Follow-up* : Six years after the onset of the PAS and four years after the court ruling. Up until three months prior to my follow-up telephone call the father had not had any contact at all with either of the children. At that point the daughter, then 18, called the father and told him that she had been living out of the home for one year because she could no longer tolerate conditions in the home. The mother had brought in a series of boyfriends, with many of whom she had violent relationships, often necessitating police intervention. One year after leaving the home, the girl began to appreciate that she had been programmed by her mother, called her father, and began reconciling with him. We see here the uncommon situation where the reconciliation came in spite of the failure of the court to order visitation. It came with cognitive maturity *and* oppressive and abusive exposures in the home of the alienator, exposures that helped foster the reconciliation (I refer to this as Case No. 96).

The younger son, then 15 at the time of follow up, was still living with the mother and was still severely alienated from the father. The father's hope, however, was that the daughter would be able to enlighten the youngster and ultimately bring about reconciliation. This was just beginning to happen, but it was obvious that the boy had a long way to go down the path toward reconciliation with his father. We see here how an older sibling cannot only serve as an assistant programmer to alienating parent but, in rare situations, serve as an assistant deprogrammer for the alienated parent (I refer to this as Case No. 97).

No. 96 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **Yes**

No. 97 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

### **Case Nos. 98 and 99**

This was a case in which a PAS was indoctrinated in two boys by their widowed father's cousin. She was an unmarried woman who had never had children of her own. Over the years,

she provided progressively expanding babysitting and carpooling services for the working father. As the years passed, the children spent increasingly more time in her home. When the father remarried, the cousin launched a campaign of PAS indoctrinations wherein, literally, in a six-week period, she was successful in progressing them from mild, to moderate, to borderline-severe PAS. (We see here an example of how rapidly PAS indoctrinations can be inculcated under certain circumstances.)

I testified in this case and recommended an immediate return of the children to the home of their father and stepmother with a restraining order on the cousin, so tenacious was she with regard to her indoctrinational maneuvers.

*The Court's Ruling* : The court recognized the father as the rightful parent, and ordered a visitation program for the cousin to be monitored by a therapist.

*Follow-up* : Three months after my testimony. The children were still spending significant time with the cousin although there was certainly some time spent at the home of their father and stepmother. There was no significant change in the depth of the PAS, which was still borderline severe.

No. 98 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

No. 99 Custody Changed or Alienator's Access Reduced **No**

PAS Symptoms Reduced or Eliminated **No**

## **RESULTS**

The court chose to either restrict the children's access to the alienator or change custody in 22 of the children. There was a significant reduction or even elimination of PAS symptomatology in all 22 of these cases. This represents a 100 percent success rate. The court chose not to transfer custody or reduce access to the alienator in 77 cases. In these cases there was an increase in PAS symptomatology in 70 (90.9 percent). In only 7 cases (9.1 per cent) of the nontransferred was there spontaneous improvement. Custodial change and/or reduction of the alienator's access to the children was found to be associated with a reduction in PAS symptomatology ( $\chi^2(df=1)=68.28, p.<.001$ ). These results are summarized in Table 3. These findings are consistent with those of the 3 previously referenced studies (34, 35, 36).

## **DISCUSSION**

This study provides confirmation of my longstanding observation that the most potent therapeutic measure that one can utilize for PAS children is reduction of their access to the alienating parent. In some cases, this reduction requires custodial transfer. In others, reduction of the alienator's access time may prove effective. And only the courts have the power to effect such reduction of access. The principle here is similar to that utilized when treating patients who have been indoctrinated in a cult. Before one can treat, one must reduce, if not eliminate entirely, their involvement with the cult leaders. Whereas one can hope for complete removal of a cult victim from a cult, the goal of removing a child from a parent is an entirely different matter. In most cases, the PAS indoctrinator can still provide the child with psychologically beneficial input and exposures in spite of the fact that the child is also being programmed. Thus, the reduced

access element is not as easily accomplished with PAS children as it may be for children programmed by cult leaders.

The study also provides substantiation for my longstanding observation that the bonding that the child has with the targeted parent is potentially the most powerful preventive of the PAS and a very powerful antidote to PAS symptomatology in many cases.

The study also provides confirmation of my longstanding observation that traditional therapy is of little if any value for the vast majority of PAS children. In fact, for most it makes them worse, because traditional therapists usually do just the opposite of what PAS children need.

It is important to note that the 7 cases in which the children exhibited reduced PAS symptomatology, in spite of the court's refusal to reduce the alienator's access, were cases in which the children were in their teens and so were cognitively capable of appreciating the programming process. In these cases, as well, there were behavioral patterns exhibited by the alienator that facilitated the child's reconciliation with the alienated parent. There was some neglect and even abuse by the alienating parent (Case No. 96 being the most dramatic example of such abuse) that contributed to the child's reconciliation with the alienated parent. Although 7 cases cannot reasonably be considered compelling proof, the phenomenon must be noted. It would be an error, however, for the reader to conclude that this is a likely possibility. It must be remembered that this only occurred in 9.1 percent of the 77 cases in which the court did not change custody or reduce the alienator's access. This figure must be compared to the 100 percent success rate when PAS children were transferred to the primary custody of the alienated parent and/or there was significant constriction of the alienator's access to the children.

### **LIMITATIONS OF THE STUDY**

One possible limitation of this study was my failure to interview the alienators. However, as explained, the likelihood of my obtaining cooperation from more than a small percentage of the alienators was extremely small. In each case, the alienator routinely was angry at me because my recommendations involved either reduction of his (her) access to the children or custodial transfer.

In every case when my involvement was initially solicited by one of the parties, I presented to the caller my preference for the ideal evaluation, namely, one in which I would have the opportunity to conduct clinical interviews with both parents and child(ren), both individually and in varying combinations. Such attempts were not successful in some of the cases, and this represents a limitation of the study. However, in all of the cases I reviewed extensive material and did not include any children in this follow-up study who I was not fully convinced suffered with PAS symptoms. The PAS is a relatively "pure" disorder when compared to other psychiatric disturbances and is readily diagnosed—especially when moderate and severe symptomatology is present.

Last, I was the only person to do follow-up interviews. As the person who also did the initial evaluations and who came to the conclusion that PAS was present, one could argue that an entirely independent interviewer should have been used to collect the follow-up data in order to circumvent the possible bias of my doing the follow-up interviews of my own clients. An argument against use of another party's serving as the follow-up interviewer, is the fact that I had already established a good relationship with just about all of the victimized parents, and so could rely upon them to provide me with the time and conviction for a follow-up interview.

## CONCLUDING COMMENTS

When I embarked upon this study, I expected that most of the PAS children would continue to be alienated from the target parent in situations in which the court neither transferred custody to the target parent nor reduced the alienating parent's access to the children. What I did not expect was the high rate of completely destroyed relationships and the enormous grief suffered by the alienated parents. I expected the average conversation to last five minutes, during which I would get the basic data. It turned out that most conversations lasted between 15 and 30 minutes, because the parents needed me at that point for some kind of ventilation of their painful feelings. I did not expect such a degree of grief. However, on looking back upon the study, I should not have been surprised. I consider losing a child because of PAS to be more painful and psychologically devastating than the death of a child. Death is final and there is absolutely no hope for reconciliation. Most bereaved parents ultimately resign themselves to this painful reality. The PAS child is still alive and may even be in the vicinity. Yet, there is little if any contact, when contact is feasible. Therefore, resignation to the loss is much more difficult for the PAS alienated parent than for the parent whose child has died. For some alienated parents the continuous heartache is similar to living death.

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### REFERENCES

1. Gardner, RA: [Recent trends in divorce and custody litigation](#). *Academy Forum* (a publication of the American Academy of Psychoanalysis) 1985; 29(2):3-7
2. Gardner, RA: *Child Custody Litigation: A Guide for Parents and Mental Health Professionals*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1986
3. Gardner, RA: *The Parental Alienation Syndrome and the Differentiation Between Fabricated and Genuine Child Sex Abuse*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1987
4. Gardner, RA: Child custody. In *Basic Handbook of Child Psychiatry*, edited by Noshpitz, J.D., Vol. V, pp. 637-646. New York, Basic Books, Inc., 1987
5. Gardner, RA: [Judges interviewing children in custody/visitation litigation](#). *New Jersey Family Lawyer* 1987; 7(2):26ff
6. Gardner, RA: *Family Evaluation in Child Custody Mediation, Arbitration, and Litigation*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1989
7. Gardner, RA: [Legal and psychotherapeutic approaches to the three types of parental alienation syndrome families: when psychiatry and the law join forces](#). *Court Review* 1991; 28(1):14-21
8. Gardner, RA: *The Parents Book About Divorce, Second Edition (paperback)*. New York, Bantam Books, Inc., 1991

9. Gardner RA: *Sex Abuse Hysteria: Salem Witch Trials Revisited*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1991
10. Gardner, RA: *The Parental Alienation Syndrome: A Guide for Mental Health and Legal Professionals*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1992
11. Gardner, RA: *True and False Accusations of Child Sex Abuse*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1992
12. Gardner, RA: [The detrimental effects on women of the misguided gender egalitarianism of child-custody resolution guidelines](#). *The Academy Forum* (a publication of the American Academy of Psychoanalysis) 1994; 38(1/2): 10-13
13. Gardner, RA: *Protocols for the Sex-Abuse Evaluation*. Cresskill, New Jersey, Creative Therapeutics, Inc. 1995
14. Gardner, RA: Recommendations for dealing with parents who induce a parental alienation syndrome in their children. *Issues in Child Abuse Accusations* 1997; 8(3): 174-178
15. Gardner, RA: [Recommendations for dealing with parents who induce a parental alienation syndrome in their children](#). *Journal of Divorce & Remarriage* 1998; 28(3/4):1-23
16. Gardner, RA: *The Parental Alienation Syndrome, Second Edition*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1998
17. Gardner, RA: [Differentiating between the parental alienation syndrome and bone fide abuse/neglect](#). *American Journal of Family Therapy* 1999; 27(2)
18. Gardner, RA: [Family therapy of the moderate type of parental alienation syndrome](#). *The American Journal of Family Therapy* 1999, 27(3): 195-212
19. Gardner, RA: *Therapeutic Interventions for Children with Parental Alienation Syndrome*. Cresskill, New Jersey, Creative Therapeutics, Inc., 2001
20. Gardner, RA: [The parental alienation syndrome: Sixteen years later](#). *The Academy Forum* (a publication of the American Academy of Psychoanalysis) 2001; (in press)
21. Gardner, RA: Leading stimuli, leading gestures, and leading questions. *Issues in Child Abuse Accusations* 1992; 4(3):144-155.
22. Gardner, RA: The embedment in the brain circuitry phenomenon (EBCP). *Journal of the American Academy of Psychoanalysis* 1997; 25(1):151-176.
23. Gardner, RA: *Therapeutic Communication with Children: The Mutual Storytelling Technique*. New York, Jason Aronson, Inc., 1971
24. Gardner, RA: *Psychotherapeutic Approaches to the Resistant Child*. New York, Jason Aronson, Inc., 1975.
25. Gardner, RA: *Psychotherapy with Children of Divorce*. New York, Jason Aronson, Inc., 1976

26. Gardner, RA: *Separation Anxiety Disorder: Psychodynamics and Psychotherapy*. Cresskill, New Jersey, Creative Therapeutics, 1984
27. Gardner, RA: *The Psychotherapeutic Techniques of Richard A. Gardner*. Cresskill, New Jersey, Creative Therapeutics, 1986
28. Gardner, RA: *Psychotherapy with Adolescents*. Cresskill, New Jersey, Creative Therapeutics, 1988
29. Gardner, RA: *Psychotherapeutic Techniques of Richard A. Gardner, Second Edition*. Cresskill, New Jersey, Creative Therapeutics, 1992
30. Gardner, RA: *Self-Esteem Problems of Children: Psychodynamics and Psychotherapy*. Cresskill, New Jersey, Creative Therapeutics, 1992.
31. Gardner, RA: *Conduct Disorders of Childhood: Psychodynamics and Psychotherapy*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1994
32. Gardner, RA: *Psychogenic Learning Disabilities: Psychodynamics and Psychotherapy*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1996
33. Gardner, RA: *Psychotherapy with Sex-Abuse Victims: True, False, & Hysterical*. Cresskill, New Jersey, Creative Therapeutics, Inc., 1996
34. Clawar, SS and Rivlin, BV: *Children Held Hostage: Dealing with Programmed and Brainwashed Children*. Chicago, Illinois, American Bar Association, 1991.
35. Dunne, J and Hedrick, M: [The parental alienation syndrome: an analysis of sixteen selected cases](#). *Journal of Divorce and Remarriage* 1994; 21(3/4):21-38.
36. Lampel, A: [Post-divorce therapy with high conflict families](#). *The Independent Practitioner*, Bulletin of the Division of Psychologists in Independent Practice, Division 42 of the American Psychological Association 1986; 6(3):22-26.
37. *Kilgore v. Boyd*. 13<sup>th</sup> Circuit Court, Hillsborough County, FL Case no. 94-7573, November 22, 2000

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about the author

Richard A. Gardner, M.D. is Clinical Professor of Child Psychiatry at the College of Physicians and Surgeons, Columbia University, in New York City. In addition, he is in private practice in Cresskill, New Jersey. He is the author of numerous books and articles on various aspects of forensic psychiatry. His most recent books related to this article: *The Parental Alienation Syndrome, Second Edition* (1998) and *Therapeutic Interventions for Children with Parental Alienation Syndrome* (2001).