THE SPECTRUM OF PARENTAL ALIENATION SYNDROME (PART II)
(First of 3 HTML files)
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This three-part article reviews the literature on the Parental Alienation Syndrome (PAS) as formulated by Dr. Richard Gardner and seeks to integrate his work with research on high conflict divorce and the work of other professionals in this arena. Parental Alienation Syndrome (PAS) is a distinctive form of high conflict divorce in which the child becomes aligned with one parent and preoccupied with unjustified and/or exaggerated denigration of the other, target parent. In severe cases, the child's once love-bonded relationship with the target/rejected parent is destroyed. Part II begins with sections on the child in PAS, the target/alienated parent and the third parties who become involved, including family, friends, lawyers, mental health professionals, and sometimes cults. The material presented on PAS in the legal arena is devoted to what attorneys and judges have to say about PAS, which can be a key issue in certain dependency and criminal proceedings, as well as in family law court. The discussion of forensic evaluations and PAS includes contributions by custody evaluators and others who recommend considering PAS as a possible explanation when child sex abuse is alleged in certain contexts. Case vignettes in Part II illustrate psychological maltreatment of the child in severe PAS, a case in which Child Protective Services was mobilized to bring pressure on the alienating parent to reverse the PAS, and the use of PAS testimony in criminal proceedings against a falsely accused parent. Part III will be devoted to interventions in PAS, including some difficult but effective interventions implemented by the author, her husband, Randy Rand, Ed.D., and a team of interveners, including the judge and guardian ad litem.

The Parental Alienation Syndrome (PAS) as formulated by Gardner involves a cluster of child symptoms in divorce. Gardner views these as a syndrome because of the number of cases in which these
symptoms share a common underlying etiology. This is a combination of the alienating parent's influence and the child's active contributions to the campaign of denigration against the alienated/target parent. The term PAS does not apply when children of divorce become alienated from a parent for reasons such as a parent's lack of interest in or rejection of the child; significant deficits in a rejected parent's functioning which may not rise to the level of abuse; or the child being subjected to bona fide parental abuse or neglect. These situations should be given the generic label of parent-child alienation. The Parental Alienation Syndrome as conceived of by Gardner is a type of parent-child alienation but warrants a special descriptive term. The benefit of using Gardner's terminology is that, where the facts of a given case support a diagnosis of PAS, there is a body of knowledge regarding which legal and therapeutic interventions are likely to be effective.

Part I of this article, published in a previous issue of the American Journal of Forensic Psychology (Volume 15, issue 3, 1997), outlined Gardner's formulation of PAS, discussed the contemporary social context in which his ideas arose, and described the features of PAS which, especially in more serious cases, make it a distinctive form of high conflict divorce. The studies reviewed in Part I included a large scale research project by Clawar and Rivlin, which was commissioned by the American Bar Association Section on Family Law (1). Clinical studies of PAS by Dunne and Hedrick (2), Lund (3) and Cartwright (4) were also discussed. Two case vignettes were presented, one in which the mother was the alienating parent and the other with the father in that role. Part I concluded with a section on parents who induce alienation, utilizing divorce research and the work of mental health professionals who deal with divorce families in the forensic arena. Part II begins with the child.

THE CHILD IN PAS

Children of Divorce

Most children and adolescents of divorce are eager to have an ongoing relationship with both parents. In a nonclinical sample of 131 children from 60 divorce families, the majority of children were eager to visit their noncustodial fathers and often wanted
more time than the usual every other-weekend allowed (5). This finding held at follow-ups 18 months and 5 years later. For children whose fathers did not take much of an interest in them, their longing for both parents was very painful. Where the father did take an interest, 20 percent of children were in considerable conflict about visiting and 11 percent were genuinely reluctant to visit, most notably those who were between 9 and 12 years of age. Nineteen percent of the children who were reluctant or refusing to visit were aligned with one parent in actively doing battle against the other parent. Children in these alignments came to share the views and outrage of the parent with whom the child identified, often the parent who felt abandoned and rejected in the divorce. These children rejected the parent who was perceived as deserting the family, despite a previously close, loving relationship with that parent. Children in alignments were found to be less psychologically healthy than those whose divorce adjustment allowed them to maintain their affection for both parents.

Children's Alignments in High Conflict Families

Johnston and Campbell's research on divorce families in high conflict for three years or more found a measurable degree of alignment between children and one parent in 35 percent to 40 percent of children from-7 to 14 years of age (6). Similar ratios were obtained by Lampel, who studied latency-age children participating in custody evaluations (7). Comparing aligned children with non-aligned children, Lampel found that the aligned children tested as angrier, less well adjusted, and less able to conceptualize complex situations. They expressed greater self confidence, however, possibly reflecting the relief obtained by opting for a simplified, relatively black-and-white solution, as opposed to feeling "caught in the middle" of parental conflicts. Published in 1996, this article of Lampel refers to Gardner's work on PAS.

Children Who Reject One Parent

Ten years earlier, Lampel reported on 18 consecutively referred high conflict divorce families, including a group of children who actively rejected one parent (8). In these seven cases, the rejected
parent was the father. Lampel found the child's lack of normal ambivalence noteworthy in these seven cases and further observed intense collusion between mother and child. Lampel implemented a family intervention strategy which treated these children's reactions as a phobia with hysterical features. One child who was placed with the rejected parent for six to eight weeks while Lampel worked intensively with all family members reported a marked reduction in symptomatology. Of the remaining cases treated with phobia reduction techniques, results ranged from minor improvement to deterioration. In the three cases where intervention clearly failed, Lampel concluded it was because the mother's collusive involvement with the child was too strong.

Children Who Refuse Visitation

According to Johnston in 1993, "It is surprising that such a perplexing and serious problem as children's refusal to visit has received so little systematic attention by researchers" (9; p. 110). In a study focused specifically on this problem, Johnston recognized Gardner's work on PAS. Results of research by Johnston and her colleagues led to the conclusion that children's resistance or refusal to visit a nonresidential parent after separation and divorce is an overt behavioral symptom that can have its roots in multiple and often interlocking psychological, developmental and family systemic processes. Clawar and Rivlin articulated similar findings in their study published two years earlier (1).

Developmental Issues of Children Who Refuse Visitation

Analysis of data from 70 high conflict divorce families enabled Johnston and her colleagues to identify specific developmental issues for each age group which can impact children's reluctance and refusal to visit. Emotional disturbance of the primary parent, usually the mother, was found to exacerbate developmental effects. For 2- to 3-year-olds, age appropriate separation anxiety from the mother was found to be a factor in resistance to visitation. In normal development, children this age have not yet developed an internalized image of the primary parent figure.
Their sense of time is not yet sufficiently developed for them to understand that they will be getting back to the primary parent within a comfortable time frame. Parents may blame each other when children this age display resistance to visitation, even though such problems may be due in part to developmental factors.

Johnston found that 3 to 6 year-old children in high conflict divorce tended to shift their allegiances depending on which parent they were with. This may contribute to children's difficulty in transitioning from one home to another. Normally, children in this age group have not yet learned to entertain two conflicting points of view. As a result, when the child is told in mother's home that father does not provide enough money, the child will temporarily align with mother. The child will shift allegiance to father when told in his home that mother just wastes the money. Children from 3-6 years of age become easily confused and can readily excite concern and chaos by telling different stories to each parent. In addition, the normal course of development is for children's preferences to shift back and forth from one parent to the other as they grow older and sort out their gender identity. Children in the 3-6 age range experience a strong drive to align with the opposite sex parent and to compete with and to exclude the same sex parent. In divorce, the young child's developmentally normal fantasies about eliminating the same sex parent may be fulfilled. This creates intense guilt and anxiety for the child, which can contribute to resistance to visitation.

Children of divorce in the 6- to 7-year age range are more likely to suffer from loyalty conflicts, and to be concerned about hurting their parents. Such conflicts reflect the normal child's growing sense of morality and capacity to see things from the viewpoint of another. Children 7 to 9 years of age have begun to develop the capacity to imagine how their parents view them and to experience the cognitive dissonance of their parents' conflicting views. There may be a growing need to resolve such conflicts because children in this age range experience the loyalty conflicts of divorce more acutely.
High conflict divorce children in the 9- to 12-year-old group are particularly vulnerable to forming strong, PAS type alignments with one parent, as they try to "resolve" their earlier loyalty conflicts. Johnston noted that adults also tended to expect more of children this age, viewing them as "old enough to take a stand" in parental disputes. Forty-three percent of these children were in strong alignments and 29 percent in mild alignments. According to Johnston, these figures approach Gardner's estimate that 90 percent of the children he has assessed in custody evaluations exhibit varying degrees of PAS. Johnston found that in some cases, parent-child alignments often continue for several years into mid-adolescence. As teenagers, some aligned youngsters develop the capacity to take a more objective, independent stance. However, a significant proportion of high conflict divorce children are unable to withdraw from the parental fights and maintain their stance of rejection and denigration toward the target parent throughout adolescence.

**Strong Alignments**

Johnston found that 28 to 43 percent of the 9- to 12-year-olds were in what she termed "strong alignments," characterized by consistent rejection and denigration of the other parent (9). Children tended to make stronger alliances with the more emotionally dysfunctional parent, who was more likely to be the mother. In *Impasses of Divorce*, Johnston described children in strong alignments as forfeiting their childhood by merging psychologically with a parent who was raging, paranoid, or sullenly depressed (6). Factors within the child which contributed to the formation of strong alignments were found to be: 1) need to protect a parent who was decompensating, depressed, panicky or needy; 2) need to avoid the wrath or rejection of a powerful, dominant parent (often the custodial parent on whom the child was dependent; and 3) need to hold onto the parent the child was most afraid of losing, for example, a parent who was too self-absorbed or who was only casually involved with the child.

**Extreme Alignments**
Among children who were refusing visitation, Johnston identified a particularly troubled group of children whom she described as being in "extreme alignments"(9). In her most recent book, she and Roseby reserved Gardner's label "parent alienation syndrome" for these cases (10). Children in extreme alignments were more likely to be viewed as disturbed by parents, teachers and clinicians (9). These children exhibited bizarre and sometimes destructive behavior. They were more likely to display unintegrated, chaotic attitudes with few workable defenses. Often the child's negative interpretation and distortions of the target parent's character and behavior were found to have a bizarre quality (6, 9). The case vignette of Mr. and Mrs. C in Part (I) I described how the behavior of their daughter, V, became increasingly bizarre and self-destructive especially after her father gained sole custody in dependency court based on false allegations of sexual abuse against Mrs. C's new husband.

Pseudologia Fantastica

Once separated from her mother, V's stories of abuse by her stepfather became more numerous and improbable, including charges of repeated rape although the gynecological exam was normal. Bernet suggested that. the century-old concept of pseudologia fantastica is one explanation for elaborate, implausible, untruthful reports of abuse (11). Children who exhibit pseudologia fantastica, represent certain fantasies as if they were actual occurrences, although there is little or no reality basis for these stories. Ditrich posited that children who engage in pseudologia fantastica do so in order to defend against the pain of an unbearable, present reality (12). V engaged in pseudologia fantastica in part to cope with the unbearable loss of her mother, who had been the primary parent. Her father, Mr. C was so driven by his need for revenge against V's mother that he encouraged and reinforced V's use of pseudologia fantastica instead of providing reality testing.

Failed Separation-Individuation

In a recent book chapter entitled "Parental Alignments and Alienation Among Children of High Conflict Divorce," Johnston
and Roseby opined, "Rather than seeing this syndrome as being induced in the child by an alienating parent, as Gardner does, we propose that these 'unholy alliances' are a later manifestation of the failed separation-individuation process in especially vulnerable children who have been exposed to disturbed family relationships during their early years" (10; p. 202). These disturbed family relationships are viewed as the byproduct of interparental conflict and narcissistic disturbance of one or both parents. These authors hypothesize that the more extreme forms of parent alienation in early adolescence have their roots in failed separation-individuation from the alienating parent during the earliest years of the child's life. This developmental failure adversely affects the young person's life and developing sense of self. The most important ingredient in certain severe parental alienation cases, according to Johnson and Roseby, is the child's vulnerability and receptivity to the alienating parent, rather than "conscious, pernicious brainwashing" by an embittered parent.

In contrast to this view, mental health professionals practicing in the forensic arena often find evidence of substantial volitional activity on the part of the alienating parent in severe PAS. For example, in the case of Mr. and Mrs. L in Part I, the custody evaluator and others observed that the mother timed her suspected abuse report to authorities in such a way as to prevent father's visitation from going forward. Mrs. L was also observed to make denigrating remarks about Mr. L in front of the child. Whether or not these behaviors were "conscious" or "unconscious," Mrs. L was the person responsible for them and they did impact the child's relationship with the father.

Important Deviations From Usual Developmental Trends

When children who are resistant to visitation deviate from usual developmental trends, it is important to evaluate and understand the reason. Children who form consistent alignments with an alienating parent may never have separated psychologically from that parent (9, 10). Examples of this are described by Dunne and Hedrick in their study of 16 severe PAS families (2), which was reviewed in Part I. There are a variety of contributing factors to children forming strong parent-child alignments before the
highest risk period of 9 to 12 years of age. These factors include: 1) a failed separation-individuation process between parent and child; 2) intense parental pressure; 3) a child with precocious cognitive development who is more sensitive and vulnerable to parental conflict. Children can become aligned with one parent even though there is relatively little overt conflict and estrangement between the parents (9). Seemingly mild and subtle forms of parental influence can have significant effects, according to Clawar and Rivlin (1).

Child's Active Contributions in PAS

The fact that Gardner identifies the child as an active participant in the PAS is sometimes overlooked. Active contributions by the child can be part of an effort to take care of an angry, disturbed, or otherwise troubled parent with whom the child is aligned.

Some PAS children manipulate conflicts between the parents for the feeling of power it gives them in the divorce family situation which is otherwise beyond their control. Young adolescents in search of greater freedom may amplify their complaints about a stricter parent to the more permissive one, capitalizing on the permissive parent's eagerness for validation of his or her fixed negative view of the other parent. This reinforces the permissive parent's inability to contain the child and exacerbates acting out behavior. Regardless of the relative contributions to the PAS by the alienating parent or the aligned child, a mutually reinforcing feedback loop may develop which is resistant to outside influence and to reality testing. A self generating "brainwashing "process results.

In Munchausen syndrome by proxy (MSP) involving older children, it is the parent who originally initiated the child's factitious illness or victimization. In the context of a continued symbiotic parent/child relation ship, older children may then learn to set up this situation themselves, producing factitious symptoms which induce a complicitous response from the MSP parent (13). Similarly, in moderate to severe PAS, children may learn to get their needs met by fabrication and manipulation. Where there is a particularly enmeshed relationship between the
aligned parent and child, the child's legitimate strivings for autonomy are continually under mined.

The Overburdened Child

Divorce almost inevitably burdens children with greater responsibilities and makes them feel less cared for. Children of chronically troubled parents bear a greater burden. They are more likely to find themselves alone and isolated in caring for a disorganized, alcoholic, intensely dependent, physically ill, or chronically enraged parent. The needs of the troubled parent override the developmental needs of the child, with the result that the child becomes psychologically depleted and their own emotional and social progress is crippled. Wallerstein and Blakeslee used the term "overburdened child" to describe this problem (14). Wallerstein has encountered PAS [personal communication to the author, 1991], but she prefers to conceptualize it from the "overburdened child" framework.

The Psychologically Battered Child

According to Garbarino, et al., psychological maltreatment of children is more likely to occur in families where the atmosphere is one of stress, tension and aggression (15), an apt description of high conflict divorce. The Psychologically Battered Child, published in 1988, does not mention divorce directly but uses such terms as "marital discord" and "family breakdown." The special problems of children of divorce are more fully recognized in a subsequent book by Garbarino and Stott, in which Gardner's work is cited numerous times, including his work on PAS (16).

According to Garbarino et al., psychological maltreatment can be viewed as a pattern of adult behavior which is psychologically destructive to the child, sabotaging the child's normal development of self and social competence (15). Five types of psychological maltreatment identified by Garbarino et al. are adapted for PAS and described below:

1) Rejecting - The child's legitimate need for a relationship with both parents is rejected. The child has reason to fear rejection and
abandonment by the alienating parent if positive feelings are expressed about the other parent and the people and activities associated with that parent.

2) Terrorizing - The child is bullied or verbally assaulted into being terrified of the target parent. The child is psychologically brutalized into fearing contact with the target parent and retribution by the alienating parent for any positive feelings the child might have for the other parent. Psychological abuse of this type may be accompanied by physical abuse.

3) Ignoring - The parent is emotionally unavailable to the child, leading to feelings of neglect and abandonment. Divorced parents may selectively withhold love and attention from the child, a subtler form of rejecting which shapes the child's behavior.

4) Isolating- The parent isolates the child from normal opportunities for social relations. In PAS, the child is prevented from participating in normal social interactions with the target parent and relatives and friends on that side of the family. In severe PAS, social isolation of the child sometimes extends beyond the target parent to any social contacts which might foster autonomy and independence.

5) Corrupting-The child is missocialized and reinforced by the alienating parent for lying, manipulation, aggression toward others or behavior which is self destructive. In PAS with false allegations of abuse, the child is also corrupted by repeated involvement in discussions of deviant sexuality regarding the target parent or other family and friends associated with that parent. In some cases of severe PAS, the alienating parent trains the child to be an agent of aggression against the target parent, with the child actively participating in deceits and manipulations for the purpose of harassing and persecuting the target parent. This is particularly likely to occur in what Turkat called Divorce Related Malicious Parent Syndrome (17, 18).

Psychological maltreatment can be mild, moderate or severe. Effects on the child may vary according to the child's age, temperament and ability to access social support.
Children who have been psychologically maltreated by the primary caretaker on whom they depend are more likely to exhibit a variety of psychological and social handicaps. These make them vulnerable to detrimental outside influences. A case of psychological mal treatment by the alienating parent is illustrated below.

Case Vignette of Psychological Maltreatment in Severe PAS

At 13, S was a socially isolated girl who believed she was stupid. She spent recesses alone because the other kids did not accept her. She got "D" grades in school. For as long as she could remember, her mother told S she was incompetent and unlivable. S's mother would tell her, "Even your baby half sister is smarter than you are". S hadn't seen her father in 10 years. Her parents separated when she was only a few months old. Her father quickly found a new partner and remarried. Although S's mother tried to stop father's contact with the girl, father and his new wife visited with S regularly until she was three. At that time, mother was successful in persuading child protective services to stop the visitation based on allegations of sexual abuse.

Father turned to the family court for help. A custody evaluation was conducted which exonerated the father of abuse charges and indicated that the mother was using the abuse allegations to prevent the child from having a relationship with her father. After several years of family law litigation, the judge ordered reunification and appointed a reunification therapist. For the next three years, the efforts of the reunification therapist and family court mediator were thwarted by the mother. Father became depressed and entered individual therapy.

A break in the case came when S's father was referred to a PAS expert for consultation. The family mediator, reunification therapist and the court were interested in the expert's input. The judge ordered mother and daughter to meet with father's PAS expert to facilitate the father/daughter reunification. The court also threatened mother with sanctions when she refused to cooperate with the reunification plan. The reunification team,
which now included a guardian ad litem for the child, planned to gradually reacquaint S with her father. The more gradual approach proved unsuccessful. The child remained hostile and staunchly aligned with her mother.

The team agreed that a different approach was needed. The PAS expert held a meeting with S and the reunification therapist. The expert established rapport with S, who was guarded but responsive. He asked S questions and gave her information which made her curious about her father. S indicated that she was interested in exploring the contradiction between her belief that father molested her and her lack of any actual memories of molestation. This opened the door for the expert to provide age appropriate education about the concepts of thought reform and "brainwashing", as well as the problem of "false positives" when abuse is alleged. S was surprised and pleased that the expert thought her smart enough to learn about these adult concepts. For the first time, she indicated she was willing to participate in a meeting with her father.

Despite mother's continued efforts to interfere, a one day visit between S and her father went forward when S was 13. The team agreed that the PAS expert should be present at father's house. The girl was thrilled by the interest shown in her by her father and step mother, whose desire to please her contrasted sharply with how her mother treated her. The expert had to intervene once when father and stepmother set reasonable limits and S exploded. When the reunification plan called for overnight visits to begin, S's court ordered individual therapist gave the girl her pager number, with instructions to call day or night if problems arose. S called to say that she didn't want to go back to her mother's. The therapist then had to set limits with S, reminding her that everyone, including S, had to adhere to the parameters of the reunification plan.

S encountered intense anger from her mother each time she returned home. One day, S took the risk of telling her mother that she wanted a relationship with her father. Mother slapped S and told the girl that she hated her and that the rest of mother's family hated S, too. In spite of mother's efforts to punish and
The Spectrum of Parental Alienation Syndrome (Part II) by Deirde Rand, Piece 1

intimidate S, the girl's relationship with her father and stepmother grew and the girl began to blossom. For the first time, S began receiving above average marks in school. She made friends and became involved with a boyfriend. Mother tried to persuade S to get pregnant so that mother could have the baby. When S was at her father's, mother maintained secret contact with her, encouraging S's impulsive, angry outbursts and telling her daughter to run away, which S did several times. As time went by, the reunification team and the court recognized that mother's treatment of S amounted to serious psychological abuse, interspersed with episodes of physical abuse.

Mother refused to participate in treatment or otherwise modify her behavior and the court eventually gave custody to the father. In defiance of court orders, mother continued her secret undermining of S's placement with the father until S had a mental breakdown and had to be hospitalized. Father and stepmother became so discouraged that they considered allowing S to resume living with her mother. The reunification team, backed by the judge, took the position that this was not an option. The team continued to provide coordinated services in support of S's placement with the father, and to offer outreach to the mother. By age 16, S was doing well on a consistent basis. S remained troubled by her mother's rejection and unwillingness to change but continued to hope that someday her mother would get help.

THE TARGET/ALIENATED PARENT IN PAS

Gender

Children are about twice as likely to form PAS type alignments with their mothers as they are with their fathers (3, 5, 6, 9). Similarly, fathers are more likely than mothers to become target parents, especially when abuse is falsely alleged (19–23). These and other gender differences were also discussed in Part I. Some fathers who become target or rejected parents in PAS give up and withdraw, contributing to the significant dropout rate of fathers after divorce. Others persist in their efforts to establish and maintain a meaningful post-divorce relationship with their children despite daunting obstacles. What motivates these men to
persist in their efforts to father, despite rejection, calumny and protracted litigation?

Struggle for Paternal Identity

Huntington studied fathers in a nonclinical sample of 184 couples who were cooperatively involved in divorce-specific activities at the California-based Center for Families in Transition (24). As fathers struggled with the issue of paternal identity after divorce, many found themselves closer to their children as part-time fathers than they were during the marriage when they were living with their children full-time. The emotional rewards of fathering gave some men new meaning to their lives after the loss, loneliness and feelings of failure engendered by the divorce. When fathers experienced a positive response from their children, they were more likely to pursue the relationship. Huntington also observed that fathers could be driven off by the child's rejection and refusal to visit. She referenced Gardner's 1985 article in which he introduced the term PAS.

Involuntary Child Absence Syndrome

According to Jacobs, a psychiatrist who edited a book on divorce and fatherhood, the stress reaction of some fathers to divorce is due to involuntary separation from their children (25). Such stress reactions in mothers are often given a positive connotation and attributed to "maternal instincts". Jacobs contends there is not nearly as much social support for fathers in a similar situation. He brought attention to the fact that fathers may have an equally strong need to nurture and parent, experiencing profound feelings of loss and frustration when reduced to a post-divorce relationship with their children which is minimal, diminished, or nonexistent. Working with fathers in a clinical setting, Jacobs found that the ability of these men to adjust to divorce was deeply impacted by their relationship with their children. Some fathers reported that they had been the primary parent during the marriage and that their children needed them in order to cope with a mother who was chaotic and disturbed.
The fathers Jacobs saw were convinced their children would suffer if the father-child bond was ruptured. They felt frustrated and sabotaged in their efforts to maintain the bond but refused to accept the idea that their children could develop well if the father-child relationship was severed. This was true for S's father in the case vignette above. Jacobs reported that the idea of being a "visitor" in their children's lives seemed second-rate and unacceptable to the fathers with whom he worked. Common adjustment reactions included anxiety, depression, hypervigilance and outrage, especially in response to denigration and expressions of hatred by their ex-wives.

Even if it was the father's decision to leave, he was often unprepared for the emotional and practical consequences where his children were concerned. Fathers of young children who were not guaranteed continued close contact felt particularly outraged and betrayed by the system, which was seen as unfair and biased toward mothers. Fantasies of self destruction, murder, and/or kidnapping were common, although usually not acted upon.

Circumstances of the Separation Which Increase Risk of Becoming a Target Parent

The likelihood that a mother or a father will become the target parent in an alienation scenario increases according to who is seen as responsible for the marital break-up (1, 5, 6, 9, 14). The risk increases when the parent seen as responsible for the break-up is discovered to have actually been unfaithful or becomes involved with a new partner immediately after the separation (1). Leaving the marriage precipitously may also incur increased risk of becoming a target parent. The mother became the target parent in this example:

*Mrs. E was a good mother but she was also guilt ridden and conflict avoidant. She tried to leave her husband several times but each time he persuaded her to return. When she left for the last time, she allowed the children, who were 3 and 5 years of age, to stay with their father on what mother believed to be a temporary basis. She was shocked at how the children treated her when she*
came to get them. They rejected her using profanity. Father filed for custody, accusing his wife of drug abuse, neglect and abandoning the children. He tricked Mrs. E. into not attending the custody hearing, telling her it had been put off. When mother failed to appear, the court granted father's motion for custody. It took several months for Mrs. E. to get the court to order a custody evaluation. By the time an evaluator was selected and the evaluation got underway, the children had been living with their father for a year. The evaluator observed that they were distant and somewhat fearful of their mother and recommended that the children remain with the father.

Contributions by the Target Parent to PAS

The relative contribution of the target parent to the PAS scenario varies widely, depending on the severity of the PAS, psychological issues of one or both parents, the target parent's capacity to parent, and other factors.

For intervention to be effective in PAS, it is important to carefully assess the relative contributions of each parent and to consider their relative capacities for a healthy parent/child relationship. Where the target/rejected parent is seriously disturbed, has abused the child or is seriously inadequate as a parent, the problem may be one of generic parent alienation and is not properly called Parental Alienation Syndrome.

In mild to moderate PAS, behavior of the target parent may contribute significantly, as in the case heard by Judge Tolbert which is further described below (26). The nine-year-old girl was refusing to visit her father and he claimed PAS by the mother. Based on the totality of the evidence, however, the court concluded that father's behavior contributed significantly to the child's refusal to visit. In particular, father was found to be excessively rigid and insensitive to his daughter's needs, seemingly an example of Johnston's observation that rejected parents are often inept and unempathic with their children (6, 10).
In severe PAS, the target parent may be relatively healthy and contribute minimally to the PAS, compared to the alienating parent. This is particularly likely to be the case with Divorce Related Malicious Parent Syndrome, where the alienating parent's anger, aggression, manipulation and deception tend to be driven by internal forces which far exceed external realities and contributions of the target parent (17, 18). The case vignette of Mr. and Mrs. C. in Part (I) demonstrated how a determined, unscrupulous father succeeded in wresting custody from a fit, custodial mother, who was the target parent.

According to Johnston's work with high conflict families, unresolved anger and continued narcissistic injury of either parent may contribute significantly to the child's rejection of one parent (6). Huntington found that in a nonclinical divorce sample, fathers sometimes engaged in controlling, provocative behavior in their efforts to reestablish a lost sense of control, especially if the divorce was not of their own choosing (24). Nicholas suggested that target parents may reinforce the PAS by assuming an ambivalent or inconsistent stance toward custody after years of litigation (27). Lund cited her experience with moderate PAS families in which the hated parent, usually the father, often exhibited a distant, rigid style which was seen by the child as authoritarian, especially in comparison to the preferred parent, who was overly indulgent and permissive (3). It is important not to overgeneralize, however, and to keep in mind that behavior of the aligned parent and child may influence and concretize the ambivalence reserve or indignation of the rejected parent.

Target Parents Who Are Falsely Accused

An accusation of child abuse, especially molestation, can quickly cut off an accused parent's access to his child, pending an investigation (28). Because sex abuse is often difficult if not impossible to disprove, the accused parent may spend months and even years trying without success to refute the charge. Clear resolution of such allegations may be impossible as a result of the accusing parent's actions, poor training and technique of the investigators, involvement of multiple agencies and lack of
coordination between agencies and different branches of the judicial system (6).

Even if the charge is successfully refuted and the accused parent's rights are reinstated, the parent has lost valuable time with the child, damaging the parent-child relationship.

According to Patterson, additional repercussions for the falsely accused parent include damage to personal dignity, reputation in the community, and depletion of financial and other resources needed to defend the charge and to preempt the possibility of criminal action (29). An unproved accusation alone is sometimes enough to have an accused parent arrested and held in jail until a preliminary hearing and beyond. A parent who is criminally tried runs a significant risk of false conviction in the current legal climate. When sex abuse is alleged today, the presumption of innocence is often set aside with the justification that it is better to convict an innocent person than to allow a real child abuser to go free. Patterson's article references Gardner's book, *The Parental Alienation Syndrome and the Differentiation Between Fabricated and Genuine Child Sex Abuse*. Patterson concludes, "We can never serve a child's best interest by denying him or her the love and affection of a parent who has himself been victimized by a lie" (29; p. 941).