

The Chameleon Child: Children as Actors in the High Conflict Divorce Drama

BENJAMIN D. GARBER

HealthyParent.com, Nashua, New Hampshire

Contemporary theory asserts that children become triangulated into their parents' conflicts due to alienation, estrangement, and enmeshment. These dynamics account for some children's alliance with one parent and rejection of the other. The present article suggests that the child's innate need to adapt and the caregivers' corresponding needs for confirmation together create an additional dynamic that must be considered as part of any family system evaluation. The "chameleon child" engages in necessary and natural short-term adaptive behaviors at unknown developmental costs. An observational protocol is described with which evaluators can begin to distinguish among these dynamics. Case illustrations are provided.

KEYWORDS *divorce, custody, alienation, estrangement, enmeshment, attachment, adaptation*

Research, theory, and hard-won experience have converged to suggest that a child's polarized position within the high conflict family is commonly determined by multiple factors (Friedlander & Walters, 2010; Garrity & Baris, 1994; Johnston, Roseby, & Kuehnle, 2009; Meier, 2010). Seldom is the child's alliance with Parent A and rejection of Parent B the exclusive result of one adult's actions. Instead, evaluators and courts are now learning to ask how each of several specific dynamics co-determine the quality of the child's familial relationships and, on this basis, how best to assure that the child has the opportunity to enjoy a healthy relationship with both parents.

Among these dynamics are the child's experience of domestic violence, alienation, estrangement, and enmeshment. The present article suggests that the child's own behavior within the conflicted family system must be

Address correspondence to Benjamin D. Garber, Ph.D., 400 Amherst Street, Suite 407, Nashua, NH 03063. E-mail: papaben@healthyparent.com

considered as yet another relevant factor; that the child is, in fact, an active participant in the family's turmoil. The child's natural and necessary need to adapt to the caregiving environment is described as prompting some children, caught in the midst of warring parents, to behave in a chameleon-like manner. These "chameleon children" change their emotional colors so as fit in to each of two very disparate environments. When Parent A misinterprets the chameleon child's contextually-determined words and behavior as confirming and validating his or her negative beliefs about Parent B, conflict needlessly escalates to the detriment of all.

INTRA-FAMILIAL DYNAMICS OF HIGH CONFLICT DIVORCE

In recent decades, family law has made significant strides understanding and evaluating the dynamics of high conflict custody litigation. In particular, the introduction of the concept of alienation has opened many courts' eyes to the complex and often destructive dynamics at work within families in transition and their impact on child-parent relationships. Of course, controversy about the nature of alienation has incited painful professional schisms not yet entirely healed, but the dispute has both deepened and broadened the discussion (Gardner, 2004; Kelly & Johnston, 2001). As a result, alienation is now generally conceptualized as one among several commonly co-occurring family system dynamics, all of which must be evaluated if one is to presume to serve the best interests of any particular child (Fidler & Bala, 2010).

Alienation, Estrangement, and Enmeshment

Children's relationship with their parents must be understood as potentially impacted by a number of intrafamilial pressures. Alienation describes the child's experience of Parent A's negative emotions, words, and behaviors regarding Parent B, such that the child resists or rejects contact with Parent B without objective cause (Garber, 2004a; Kelly & Johnston, 2001). Estrangement or realistic rejection describes the child's resistance to or rejection of Parent B due to direct experience of Parent B's relatively insensitive, unresponsive, or inappropriate caregiving behaviors (Drozd & Olesen, 2004; Lee & Olesen, 2001). Enmeshment describes a corruption of roles and boundaries between the child and Parent A, such that the child is, for example, enlisted as that parent's ally or caregiver (Garber, 2011). The enmeshed dyad often resists separation, contributing not only to the child's resistance to contact with Parent B, but to other age-appropriate activities as well.

Domestic Violence

The immediate and developmental impacts of the child's experience of violence between caregivers has been well-documented (Hardesty,

Haselschwerdt, & Johnson, 2012; Jaffe, Crooks, & Bala, 2009). Some authors have suggested that the child's experience of parental violence is one factor to be considered relevant to estrangement and part of a larger hybrid model (Drozd & Olesen, 2004; Fidler & Bala, 2010; Friedlander & Walters, 2010).¹ Others have argued, instead, that a determination of domestic violence is sufficient to explain a child's rejection of Parent B and thereby to preclude consideration of alienation Meier (2010).²

INTRAFAMILIAL CONFLICT AS A CYBERNETIC SYSTEM

Describing how these multiple pressures co-occur over time and in the context of the larger family system challenges the linear, logical, cause-effect structure of our language. In fact, the dynamics of even the most basic system can take on the circularity of an Escher print and the complexity of predicting a weather pattern (Stroud, Durbin, Wilson, & Mendelsohn, 2011). Where the insoluble chicken-egg system has only two elements, the family system has at least three (Parent A, Parent B, child), each of which simultaneously serves as both cause and effect of its internal dynamics, thereby creating a cybernetic system. As the number of players increase (e.g., siblings, new partners, grandparents), the number of relationships and subsystems grows exponentially and so, too, does the complexity of the system.

More than defying description, however, the complexity of the family system defies the court's accustomed search for guilt and innocence, perpetrator and victim, and hero and villain. Recognizing the number and complexity of the dynamics at work suggests that there is seldom a good guy or a bad guy. One is left to understand the child, instead, living in the midst of a maelstrom of conflicted needs, emotions, behaviors, and perceptual biases.

THE CHAMELEON CHILD

As it presently stands, the child caught in the midst of parental conflict is often cast as a passive recipient of the pressures imposed by alienation, estrangement, enmeshment, and domestic violence; a blank slate upon which caregivers write their respective and conflicting agendas. The child is credited with adapting to these pressures, perhaps by accommodating internal working models of attachment figures (Garber, 2004a). However, these adaptations are seldom considered as they feedback into and themselves contribute to the family's ongoing dynamics. The resulting emphasis on the adults' behavior as causes of the child's distress is characteristic of the court's guilt-versus-innocence, perpetrator-victim heritage, but neglects entirely the child's active contribution to the system's dynamics.

In fact, from at least birth on, children bring idiosyncratic needs and behaviors to the family which shape the group's dynamics no less than those of the adults and which, in turn, shape the child's needs and need expression. Chief among these needs and pervasive throughout the course of development is the evolutionary imperative to adapt to the caregiving environment.

Attachment theory describes how children adapt their behavior uniquely to each of their caregivers so as to maximize safety and the opportunity for nurturance. John Bowlby (1969/1982), the father of attachment theory, suggested that, beginning early in infancy, the child gradually builds an internal working model of the experience with each caregiver so as to better anticipate that caregiver's likely behavior and thereby get the child's needs fulfilled. Thus, "secure," "insecure," and "disorganized" attachments (and the subtypes thereof) do not reflect attributes of the child like height or weight or intelligence, but instead describe how the child has adapted to a particular caregiving relationship. This point is made time and again by reference to studies of children's attachment relationships with each of their two parents: The quality of a child's attachment to the mother is independent of the quality of the attachment to the father (Brown, Schoppe-Sullivan, Mangelsdorf, & Neff, 2010; Caldera & Lindsey, 2006; Freeman, Newland, & Coyl, 2010; Main & Weston, 1981). Nowhere is this fact more dramatically illustrated than among children whose parents are intractably conflicted.³

The adaptive demands faced by a child forced to migrate between disparate and warring caregivers can be overwhelming. Smart (2002) speaks of these children, "... moving not simply from one house to another, but from one emotional landscape to another" (p. 311). No sooner has this child settled into the routines and expectations of one home, the schedule demands another transition. Where caregiver consistency and mutual support would otherwise lay the foundation for the emergence of the child's identity, caregiver conflict and discontinuity can compromise the child's behavior, sense of self, and even sense of reality (Bornovalova, Blazei, Malone, McGue, & Iacono, 2013; Miller, 2001). This child is at risk for learning to cope in a chameleon-like manner, constantly changing emotional colors to fit into the proximal caregiving environment.

The chameleon child's stories are contradictory over time, varying with the caregiving environment. Interviewed in father's care, this child will sing his praises and recite mom's failings. Interviewed in mother's care, the same child will vilify dad. Confronting the chameleon child's contradictions is likely to elicit denials (and make you wonder if you misunderstood), indignation, obfuscation, or even dissociation (Helm, Snow, Triplett, Morgan, & Lambert, 2007; Silberg, 2013).^{4,5}

In its present formulation, the hybrid model would likely attribute this child's contradictions to alienation, concluding that the proximal parent must be selfishly scripting the child's words. Although this hypothesis is plausible

and must be evaluated, one risks doing harm by neglecting to consider other mutually compatible hypotheses. Among these is the chameleon-like effect of the child's need to adapt to the immediate caregiving environment, a phenomenon known as social referencing (Dunne & Askew, 2013).

Social referencing describes the child's inherent tendency to take approach-avoidance cues from a proximal caregiver's behavior, emotions, and physiological state (Cigala & Venturelli, 2011; De Rosnay, Cooper, Tsigaras, & Murray, 2006; Dickstein, Thompson, Estes, Malkin, & Lamb, 1984; Mumme & Fernald, 1996). The phenomenon has been reliably observed among infant- and toddler-parent dyads (Aktar, Majdandžić, de Vente, & Bögels, 2013; Fusaro & Harris, 2013), as a factor in the development of anxiety in school-aged children (Möller, Majdandžić, Vriends, & Bögels, 2013), and in adult risk-taking behavior (Parkinson, Phiri, & Simons, 2012). The otherwise innate and universal predisposition to social referencing has been found deficient among children diagnosed on the autistic spectrum (Cornew, Dobkins, Akshoomoff, McCleery, & Carver, 2012) and with Down's syndrome (Kasari, Freeman, Mundy, & Sigman, 1995).

CASE ILLUSTRATION

Michael and Susan were back in court on yet another post-divorce motion for contempt. Susan argued that Michael continued to defy the parenting plan, keeping 5-year-old Abby long after she was due to be returned to her mother's care. In fact, Michael acknowledged his behavior, but reported that Abby tearfully refused to return to her mother. He argued that he was only respecting the child's wishes and assured the court that Abby's resistance certainly revealed the mother's mistreatment, therefore prompting his request for full custody. Susan informed the court that Michael's claim was ludicrous. Abby hated to go with her father, complaining that he was mean and spent all of his time with his new girlfriend. A custody evaluation ensued, including interviews with Abby transported to the evaluator's office on one occasion by her mother and on a second occasion by her father.

The evaluator found that the parents' seemingly mutually exclusive reports were, in fact, both accurate. The little girl plainly wanted to stay "forever" in the care of whichever parent had delivered her to the interview.⁶ She offered only vague and insubstantial complaints about the absent parent on each occasion, and always in language appropriate to her age. Her distress was obviously real, even if her complaints were contradictory. Confronted with these contradictions, Abby first became silly and then started sucking her thumb.

In his report to the court, the evaluator acknowledged the possibility that the two parents were each prompting their little girls' complaints about one another in a manner consistent with alienation, but he concluded that

the more likely explanation was that Abby simply wanted her family reunited. He recommended family therapy, including alternating meetings between mother and child, and father and child in order to shore up the boundaries within and between the child's two family groups. He also recommended a facilitated co-parenting intervention (Garber, 2004b) intended to improve the consistency of parenting between the two homes.

CONFIRMATIONAL BIAS

We are prone to see what we expect to see. This phenomenon has been demonstrated in areas of psychology as diverse as vocational counseling (Wright-McDougal & Toriello, 2013), forensic psychological assessment (Kassin, Dror, & Kukucka, 2013), clinical intervention with anxiety (Remmerswaal, Huijding, Bouwmeester, Brouwer, & Muris, 2014), and as a function of anger (Young, Tiedens, Jung, & Tsai, 2011). Cautioning custody evaluators against the natural tendency to confirm one's expectations, Gould and Martindale (2007) advise that, "[U]ncovering information that supports one's initial impressions is inherently gratifying, while uncovering information that calls into question one's initial impressions generates discomfort" (p. 87).

Courts and custody evaluators must recognize that this wisdom applies to the families that we evaluate at every level of analysis, from the dynamics within the individual, to evaluation of each dyad, to an understanding of the family system as a whole and the family as a part of a larger social system (Johnston & Campbell, 1988). The parents who are evaluated are no less prone to see and hear what they expect Rashomon-like than we are ourselves (Davenport, 2010).⁷ Indeed, to the extent that the win-lose mentality of the court system and the intense emotions inherent in family transition and contested custody litigation are regressive influences on otherwise mature adult functioning, custody litigants are likely to be far less objective observers than most. Thus, in the same way that we are vulnerable to interpret test data consistent with pre-existing beliefs (Ben Shakhar, Bar Hillel, Bilu, & Shefler, 1998) and distort our recall of critical incidents (Harley, Carlsen, & Loftus, 2004), we must understand and expect that custody litigants interpret and report their children's words and actions consistent with their own needs.

Many high conflict divorcing parents cope with the stresses of the process by seeking external vindication or confirmation (Hoppe, 1997; Saposnek & Rose, 1990). The experience of real and threatened loss associated with divorce coupled with the promise of public defamation by someone who was once beloved, together with an attorney's encouragement to produce case-conclusive (if not partner-eviscerating) evidence is strong motivation to see a child's every action and posture and complaint

as vindication. Examples are epidemic and familiar to every courtroom. One parent contends that her 2-year-old being upset at transition is conclusive evidence that dad is abusive. Another argues that her grade school son's bandaged knees should be reported to Child Protective Services. A third sees his teenage daughter's interest in dating as a reflection of his mother's promiscuity and confirmation of the estranged wife's infidelity. These and countless similar allegations require thorough evaluation, but they are most parsimoniously understood as the child's age-appropriate behaviors (Garber, 1996). It is the parent's confirmational bias and need to feel vindicated that risks making mountains out of molehills at tremendous cost to all involved.

CASE ILLUSTRATION

George and Martha had been married for 7 years when their simmering conflict erupted into violence. George moved out and a torturous custody battle commenced, marked by frequent *ex parte* motions. Temporary orders placed 4-year-old Cassie in her mother's primary care and granted her father alternate weekend periods of care. Martha lost the battle for supervised father-daughter contact, only heightening her anxiety over the little girl's safety in the company of a man whom she had recently come to view as impulsive and dangerous.

Cassie returned from her father's care one Sunday evening excited about the weekend just past. Martha later reported to the police that the child said, "Daddy showed me all about sex!" Terrified that her worst nightmares had come true, Martha contacted her lawyer. Child Protective Services were alerted. Mom's *ex parte* motion was granted, temporarily suspending dad's contact with his daughter. The little girl was subjected to confusing and painful examinations by doctors and serial interviews conducted by Child Protective Services and the area Child Advocacy Center.

Many weeks and thousands of dollars and immeasurable stresses later, the full story finally came to light. In her entirely age-appropriate manner, the 4-year-old had been excited by a field trip she had taken with her father to the local entomology museum. Daddy had eagerly shared his knowledge about bugs and caterpillars and butterflies. Cassie's mother was so ready to hear that her former partner was abusive that she heard the little girl's poorly articulated, innocent enthusiasm about "in-sects" as certain evidence of abuse.

EVALUATING THE CHAMELEON CHILD

The evaluator tasked to determine the causes of a child's alliance with Parent A and rejection of Parent B faces a tremendously complex challenge. Drozd and

Olesen (2004) and Meier (2010) have, among others, recommended decision trees shaped by their respective views of the frequency, significance, and interaction of alienation, estrangement, enmeshment, and domestic violence.

The evaluator who seeks to understand the chameleon child's words and actions as evidence of alienation in the belief that Parent A has scripted the child's words, as estrangement in the belief that the child's resistance to Parent B is justified and perhaps a response to experiences of violence in the home, or as enmeshment in the belief that the fault lies in the breakdown of healthy parent-child boundaries risks throwing gasoline on the family fire. Any one or more of these more familiar pressures may be at work, but none singly or in combination adequately captures the chameleon child's impact on the conflicted system.

What is clear is that none of these dynamics can be adequately identified in the child or in the parent, *per se*. The relationship pressures which bear on the child's position in the conflicted and changing family system can only be observed in the relationships themselves and as functioning at multiple levels within the family system (Bancroft & Silverman, 2004; Drozd & Olesen, 2004; Garber, 1996, 2004a; Johnston, 2003; Johnston, Walters, & Olesen, 2005; Lee & Olesen, 2001; Ludolph & Bow, 2012; Waldron & Joanis, 1996). Thus, while interview and assessment of each individual member of the system provides critical history and perspective, the evaluator must seek to understand each dyad (Parent A-Parent B, Parent A-child, Parent B-child) and the entire system (Parent A-child-Parent B) as critical components of the overall analysis.

Recognizing that some children adapt, chameleon-like, to the proximal caregiving environment, the evaluator must control this factor across observations in the same manner that science dictates control of any independent variable. At the very least, this means interviewing the child once while in each parent's care with special attention to whether and how the child's presentation changes as a function of social context. Balanced interviews across caregiving contexts (Association of Family and Conciliation Courts, 2006) and standardized child interview methods (e.g., Garber, 2007) are necessary and will sometimes be sufficient to consider the extent to which the child's responses are specific to the two distinct caregiver contexts.

THE CHAMELEON CHILD: A PROCESS-BASED OBSERVATIONAL PARADIGM

Within the scope of a comprehensive family systems evaluation, this author has found that one particular sequence of procedures can be both time efficient and quite revealing of the child's chameleon-like qualities. This procedure provides the evaluator the opportunity to observe both the quality of the child's relationship with each parent and how the child copes with the stresses of transition between parents.

Inferences About the Child as a Function of Caregiving Context

A single day is set aside such that Parent A delivers the child for individual interview. Parent A then joins the child for a semi-structured parent-child observation. At a prearranged time, Parent B arrives and the parents transition care in the examiner's presence, culminating in Parent A's departure. The child and Parent B then participate in a parallel, semi-structured, parent-child observation before Parent B is excused and the child completes a follow-up individual interview with the examiner.

By observing the child's behavior across a sequence of events mimicking the routine transitional process, the evaluator gleans not only the data available within each component part (e.g., child interview, parent A-child observation, parent B-child observation), but has the opportunity to gauge how the child copes with the transition between caregivers. The extent to which the child's presentation shifts as a function of which parent is present will inform questions about how the child is coping with family stresses and will yield hypotheses about the developmental costs of those choices. The child's anxious-ambivalent, withdrawn, silly-distracting, or angry acting out when the parents stand face-to-face can be as revealing as it is heart-wrenching. Later, debriefing alone with the child after the sequence of observations is complete, the evaluator has the unique opportunity to probe the child's perspective on the similarities and differences between the two parent-child dyads, the child's experience of the co-parent relationship, and the child's means of coping with associated stresses.

Distinguishing Chameleon-Like Responses From the Pressures Associated With Alienation, Estrangement, and Enmeshment

The child's word choice in the interview can provide important clues relevant to the distinction between alienation and chameleon-like adaptation. The child whose presentation has been scripted or coached and the child who is echoing a selfish parent's thoughts about another is likely to use rote phrases and uncharacteristic language, which the child may not even understand (Drozd & Olesen, 2004; Johnston et al., 2005). The child's words, drawings, and play may be incongruent with affective presentation. By contrast, the child who is resonating with the proximal parent's affect may struggle to put emotions into words and, when the child succeeds, will do so in words that are more clearly the child's own. This child's affect is an echo, unscripted, and in need of words.

While in the company of Parent A, the chameleon child's verbal and non-verbal presentation about Parent B may be congruent and therefore mistaken as a genuine reflection of the experience of Parent B (e.g., estrangement). However, unlike the child whose rejection of Parent B is objectively warranted and whose anger and fear are real, the chameleon child will

engage Parent B warmly and may express negatives about Parent A, resonant with Parent B's position. In each case, the chameleon child's presentation about the absent parent may ring true. It is only over time and with the benefit of sequential observations that the child's adaptive strategy can be recognized as distinct from the effects of other, concurrent dynamics.

Debriefing with the parents individually (or together as safety concerns and court orders permit) subsequent to these observations can expose important differences in their expectations, interpretations, and attributions about the child's behavior. A parent's readiness to see a child's behavior as vindicating may be a clue to the enmeshed nature of the dyad, the general psychological functioning of the adult and a contraindication for any future co-parenting intervention.

Limitations of This Model

A sequential observation protocol offers the evaluator the unique opportunity to learn how the child manages the stressful transition between conflicted caregiving environments even while it suffers from at least two downfalls. First, the artificial nature of the process and the evaluator's presence invite questions about the Hawthorne effect (Adair, 1984) and raises paradoxical questions. In short, if the chameleon child is a master of adaptation, how might that child adapt to the context of the evaluation and thereby invalidate the process?

Second, there is as yet no way to know whether and how sequence effects may affect the validity of the series of back-to-back-to-back observations such that the child's experience during the earlier dyadic observation impacts behavior in the latter dyadic observation. One partial solution with the benefit of resources would be to conduct the procedure twice, reversing the sequence. Of course, neither of these concerns is unique to the protocol proposed here. They are among the numerous reasons why some argue that custody evaluators must be extremely cautious to draw inferences and conclusions (Tippins & Wittman, 2005).

Finally, the evaluator who is alert to a child's vulnerability to caregiver context may often find that interviewing or observing the child in a neutral environment provides a unique perspective. Borrowing the principles of *in situ* observation from ethology, it may be wise to visit the child at school or during summer camp or in the company of a trusted therapist, taking care never to corrupt the child's opportunity to enjoy each as a "port in the storm" (Garber, 2010).

CONCLUSIONS

Custody evaluation and associated judicial decisions require a comprehensive analysis of all levels of the family system. Toward this goal, the evaluator

and the court must be closely attuned to the pressures which can distort and even sever parent-child relationships. This includes careful consideration of dynamics known individually as alienation, estrangement, and enmeshment, and together as constituting the hybrid model. The present article highlights yet another consideration, the extent to which the child's efforts to adapt to disparate caregiving environments in a chameleon-like manner can be misinterpreted by warring co-parents in a manner that exacerbates the adult conflict.

Like alienation, estrangement, enmeshment, and domestic violence, the child's chameleon-like adaptation is a systemic dynamic that can only be observed in the family's interactions. An observational protocol is described as one part of a larger evaluative process for the purpose of better distinguishing among these various dynamics and thereby serves the needs of the child.

What is the developmental cost of the child's chameleon-like adaptation? As one 16-year-old put it, "[Y]ou sort of change, depending what house you're at. I don't know about other people, but I find that I'm a different person at a different house. 'Cause the different environment and . . . my parents react differently to different things" (Smart, 2002, p. 312). The short-term benefits of changing one's colors so as to assure parental protection, nurturance, and affection are self-evident, but the long-term costs await longitudinal study.

ACKNOWLEDGMENTS

The author is grateful to the many children encountered in psychotherapy and in court-ordered evaluations whose experience continues to be the best teacher. The case illustrations provided herein are anonymous recreations of their real experiences.

NOTES

1. "... legal and mental health practitioners have noted that pure or 'clean' cases of child alienation and realistic estrangement (those that *only* include alienating behavior on the part of the favored parent or abuse/neglect on the part of the rejected parent, respectively) are less common than the mixed or 'hybrid' cases, which have varying degrees of enmeshment and boundary diffusion between the aligned parent and the child and some degree of ineptness by the rejected parent . . ." (Fidler & Bala, 2010, p. 15).

2. Meier (2010, p. 243) does recognize alienation as it exists as part of an abusive parent's mistreatment of the child, "... often intentionally destroy[ing] the child's relationship with his or her protective and caring mother."

3. The child's capacity for adaptation is both a recurrent popular theme and illustrated by extremes in literature. The Tarzan story (Burroughs, 1914) of a boy who adapts to life among apes may be most well-known. Cannon's (1993) eloquent contemporary children's story, "Stellaluna" about a bat who must adapt to being raised among birds may be the current generation's prototype of the same.

4. "If one parent has primary contact with the child, the child can be forced to dissociate his or her awareness of the good aspects of the other parent in order to maintain the bond with the primary caregiver. If both parents are involved in the child's life, the child may continue to switch between the two

points of view, each time dissociating awareness of the good qualities of the other parent” (Miller, 2001, abstract).

5. “Dissociative symptoms may include a child entering trance-like states, showing forgetfulness for past or current behavior, having fluctuating behavior including rapid regressions, rage reactions, beliefs in vivid imaginary friends or divided identities, and symptoms of depersonalization and derealization . . . dissociative symptoms are complex adaptations that evolve into learned habits that are then reinforced in environments in which parent-child interaction patterns continue to promote and reinforce maladaptive functioning” (Silberg, 2004, p. 487).

6. “Q: If you had a wish for yourself and your family, what would your wish be?” Frances (12): “[That] there was two of me, then I could be with mum and I could be with dad at the same time and I could see my friends” (Smart, 2002, p. 316).

7. “Rashomon” is a 1950s Japanese movie in which four witnesses provide very different accounts of the identical crime (Kurosawa & Akutagawa, 1950). The “Rashomon Effect” refers to a divergence of perspectives, highlighting differences due to observer needs and motives.

REFERENCES

- Adair, J. G. (1984). The Hawthorne effect: A reconsideration of the methodological artifact. *Journal of Applied Psychology*, *69*, 334–345. Retrieved from <http://www.apa.org/pubs/journals/apl/>
- Aktar, E., Majdandžić, M., de Vente, W., & Bögels, S. M. (2013). The interplay between expressed parental anxiety and infant behavioural inhibition predicts infant avoidance in a social referencing paradigm. *Journal of Child Psychology and Psychiatry*, *54*(2), 144–156. doi:10.1111/j.1469-7610.2012.02601.x
- Association of Family and Conciliation Courts (AFCC). (2006). Model standards of practice for child custody evaluation. *Family Review*, *45*(1), 70–91. doi:10.1111/j.1744-1617.2007.129_3.x
- Bancroft, L. R., & Silverman, J. G. (2004). Assessing risk to children from batterers. In P. Jaffe, L. Baker & A. Cunningham (Eds.), *Protecting children from domestic violence: strategies for community intervention* (pp. 101–119). New York, NY: Guilford Press.
- Ben Shakhar, G., Bar Hillel, M., Bilu, Y., & Shefler, G. (1998). Seek and ye shall find: Test results are what you hypothesize they are. *Journal of Behavior and Decision Making*, *11*(4), 235–249. doi:10.1002/(SICI)1099-0771(1998120)11:4<235::AID-BDM299>3.0.CO;2-X
- Bornovalova, M. A., Blazei, R., Malone, S. H., McGue, M., & Iacono, W. G. (2013). Disentangling the relative contribution of parental antisociality and family discord to child disruptive disorders. *Personality Disorders: Theory, Research, and Treatment*, *4*(3), 239–246. doi:10.1037/a0028607
- Bowlby, J. (1969/1982). *Attachment and loss: Vol. I. Attachment*. New York, NY: Basic Books.
- Brown, G. L., Schoppe-Sullivan, S. J., Mangelsdorf, S. C., & Neff, C. (2010). Observed and reported supportive co-parenting as predictors of infant-mother and infant-father attachment security. *Early Child Development and Care*, *1–2*, 121–137. doi:10.1080/03004430903415015
- Burroughs, E. R. (1914). *Tarzan of the apes*. Chicago, IL: A.C. McClurg.
- Caldera, Y., & Lindsey, E. (2006). Co-parenting, mother-infant interaction, and infant-parent attachment relationships in two-parent families. *Journal of Family Psychology*, *20*(2), 275–283. doi:10.1037/0893-3200.20.2.275

- Cannon, J. (1993). *Stellaluna*. San Diego, CA: Harcourt Brace Jovanovich.
- Cigala, A., & Venturelli, E. (2011). The social referencing phenomenon. *Giornale Italiano di Psicologia*, 38(2), 385–411. doi:10.1421/35170
- Cornew, L., Dobkins, K. R., Akshoomoff, N., McCleery, J. P., & Carver, L. J. (2012). Atypical social referencing in infant siblings of children with autism spectrum disorders. *Journal of Autism and Developmental Disorders*, 42(12), 2611–2621. doi:10.1007/s10803-012-1518-8.
- Davenport, C. (2010). The Rashomon effect, observation, and data generation. In *Media bias, perspective, and state repression*. Cambridge, UK: Cambridge University Press.
- De Rosnay, M., Cooper, P. J., Tsigaras, N., & Murray, L. (2006). Transmission of social anxiety from mother to infant: An experimental study using a social referencing paradigm. *Behaviour Research and Therapy*, 44, 1165–1175. doi:10.1016/j.brat.2005.09.003
- Dickstein, S., Thompson, R. A., Estes, D., Malkin, C., & Lamb, M. E. (1984). Social referencing and the security of attachment. *Infant Behavior and Development*, 7, 507–516. doi:10.1016/S0163-6383(84)80009-0
- Drozd, L., & Olesen, N. (2004). Is it abuse, alienation, and/or estrangement?: A Decision Tree. *Journal of Child Custody*, 1(3), 65–106. doi:10.1300/J190v01n03_05
- Dunne, G., & Askew, C. (2013). Vicarious learning and unlearning of fear in childhood via mother and stranger models. *Emotion*, 13(5), 974–980. doi:10.1037/a0032994
- Fidler, B. J., & Bala, N. (2010). Children resisting post-separation contact with a parent: Concepts, controversies, and conundrums. *Family Court Review*, 48, 10–47. doi:10.1111/j.1744-1617.2009.01287.x
- Freeman, H., Newland, L. A., & Coyl, D. C. (2010). New directions in father attachment. *Early Child Development and Care*, 180(1–2), 1–8. doi:10.1080/03004430903414646
- Friedlander, S., & Walters, M. G. (2010). When a child rejects a parent: Tailoring the intervention to fit the problem. *Family Court Review*, 48(1), 98–111. doi:10.1111/j.1744-1617.2009.01291.x
- Fusaro, M., & Harris, P. L. (2013). Dax gets the nod: Toddlers detect and use social cues to evaluate testimony. *Developmental Psychology*, 49, 514–522. doi:10.1037/a0030580
- Garber, B. D. (1996, March). Alternatives to parental alienation: Acknowledging the broader scope of children's emotional difficulties during parental separation and divorce. *New Hampshire Bar Journal*, 51–54. Retrieved from <http://www.nhbar.org/publications/display-latest-journal.asp>
- Garber, B. D. (2004a). Parental alienation in light of attachment theory: Consideration of the broader implications for child development, clinical practice, and forensic process. *Journal of Child Custody*, 1(4), 49–76. doi:10.1300/J190v01n04_04 10.1300/J190v01n04_04
- Garber, B. D. (2004b). Directed co-parenting intervention: Conducting child centered interventions in parallel with highly conflicted co-parents. *Professional Psychology: Research and Practice*, 35(1), 55–64. doi:10.1037/0735-7028.35.1.55

- Garber, B. D. (2007). Developing a structured forensic interview tool for children: The query grid. *Journal of Forensic Psychology Practice*, 7, 1–18. doi:10.1300/J158v07n01_01
- Garber, B. D. (2010). *Developmental psychology for family law professionals: Theory, application and the best interests of the child*. New York, NY: Springer.
- Garber, B. D. (2011). Parental alienation and the dynamics of the enmeshed dyad: Adulthood, parentification and infantilization. *Family Court Review*, 49(2), 322–335. doi:10.1111/j.1744-1617.2011.01374.x
- Gardner, R. A. (2004). Commentary on Kelly and Johnston's "The alienated child: A reformulation of Parental Alienation Syndrome." *Family Court Review*, 42, 611–621. doi:10.1177/1531244504268711
- Garrity, C., & Baris, M. (1994). *Caught in the middle: Protecting the children of high-conflict divorce*. New York, NY: Lexington Books.
- Gould, J. W., & Martindale, D. A. (2007). *The art and science of child custody evaluations*. New York, NY: Wiley.
- Hardesty, J. L., Haselschwerdt, M. L., & Johnson, M. P. (2012). Domestic violence and child custody. In K. Kuehnle & L. Drozd (Eds.), *Parenting plan evaluations: Applied research for the family court* (pp. 442–478). New York, NY: Oxford University Press.
- Harley, E. M., Carlsen, K. A., & Loftus, G. R. (2004). The "saw-it-all-along" effect: Demonstrations of visual hindsight bias. *Journal of Experimental Psychology: Learning, Memory, and Cognition*, 30, 960–968. doi:10.1037/0278-7393.30.5.960
- Helm, H., Snow, M., Triplett, V., Morgan, M., & Lambert, S. (2007). "Don't talk!": Trauma and dissociation in play therapy. In S. Dugger & L. Carlson (Eds.), *Critical incident in counseling children* (pp. 121–129). Alexandria, VA: American Counseling Association.
- Hoppe, C. F. (1997). Perpetually battling parents. In B. S. Mark & J. A. Inorvaia (Eds.), *The handbook of infant, child, & adolescent psychotherapy: New directions in integrative treatment* (pp. 485–501). New York, NY: Jason Aronson.
- Jaffe, P. G., Crooks, C. V., & Bala, N. (2009). A framework for addressing allegations of domestic violence in child custody disputes. *Journal of Child Custody*, 6(3–4), 169–188. doi:10.1080/15379410903084517
- Johnston, J., & Campbell, L. (1988). *Impasses of divorce: The dynamics and resolution of family conflict*. New York, NY: Free Press.
- Johnston, J., Roseby, V., & Kuehnle, K. (2009). *In the name of the child*. New York, NY: Springer.
- Johnston, J. R. (2003). Parental alignments and rejection: An empirical study of alienation in children of divorce. *Journal of the American Academy of Psychiatry and the Law*, 31, 158–170. Retrieved from <http://www.jaapl.org/>
- Johnston, J. R., Walters, M. G., & Olesen, N. W. (2005). Is it alienating parenting, role reversal or child abuse? An empirical study of children's rejection of a parent in child custody disputes. *Journal of Emotional Abuse*, 5(4), 191–218. doi:10.1300/J135v05n04_02
- Kasari, C., Freeman, S., Mundy, P., & Sigman, M. D. (1995). Attention regulation by children with Down syndrome: Coordinated joint attention and social

- referencing looks. *American Journal on Mental Retardation*, 100, 128–136. Retrieved from <http://aaid.org/publications/journals#.Utl-Ic8o44k>
- Kassin, S. M., Dror, I., & Kukucka, J. (2013). The forensic confirmation bias: Problem, perspective, and proposed solutions. *Journal of Applied Research in Memory and Cognition*, 2(1), 42–52. doi:10.1016/j.jarmac.2013.01.001
- Kelly, J. B., & Johnston, J. R. (2001). The alienated child: A reformulation of parental alienation syndrome. *Family Court Review*, 39, 249–266. doi:10.1111/j.174-1617.2001.tb00609.x
- Kurosawa, A. (Director), & Akutagawa, R. (Writer). (1950). *Rashomon* [Motion picture]. Japan: Daiei Film Co., Ltd.
- Lee, S. M., & Olesen, N. (2001). Assessing for alienation in child custody/access evaluations. *Family Court Review*, 39(3), 282–298. doi:10.1111/j.174-1617.2001.tb00611.x
- Ludolph, P. S., & Bow, J. N. (2012). Complex alienation dynamics and very young children. *Journal of Child Custody: Research, Issues, and Practices*, 9(3), 153–178. doi:10.1080/15379418.2012.715545
- Main, M., & Weston, D. R. (1981). The quality of the toddler's relationship to mother and to father: Related to conflict behavior and the readiness to establish new relationships. *Child Development*, 52, 932–940. doi:10.2307/1129097
- Meier, J. S. (2010). Getting real about abuse and alienation: A critique of Drozd and Olesen's decision tree. *Journal of Child Custody*, 7(4), 219–252. doi:10.1080/15379418.2010.521032
- Miller, A. (2001). *Dissociation in children "caught in the middle" between warring parents*. Presentation to the 18th International Society for the Study of Dissociation Fall Conference, December 2–4, 2001, New Orleans, LA: The Context of Dissociation: Family, Society, Culture.
- Möller, E. L., Majdandžić, M., Vriends, N., & Bögels, S. M. (2013). Social referencing and child anxiety: The evolutionary based role of fathers' versus mothers' signals. *Journal of Child and Family Studies*, June, 1–10. doi:10.1007/s10826-013-9716-3.
- Mumme, D. L., & Fernald, A. (1996). Infants' responses to facial and vocal emotional signals in a social referencing paradigm. *Child Development*, 67(6), 3219–3237. doi:10.2307/1131775
- Parkinson, B., Phiri, N., & Simons, G. (2012). Bursting with anxiety: Adult social referencing in an interpersonal Balloon Analogue Risk Task (BART). *Emotion*, 12(4), 817–826. doi:10.1037/a0026434
- Remmerswaal, D., Huijding, J., Bouwmeester, S., Brouwer, M., & Muris, P. (2014). Cognitive bias in action: Evidence for a reciprocal relation between confirmation bias and fear in children. *Journal of Behavior Therapy and Experimental Psychiatry*, 45(1), 26–32. doi:10.1016/j.jbtep.2013.07.005
- Saposnek, D. T., & Rose, C. (1990). The psychology of divorce. In D. L. Crumley & N. G. Apostolou (Eds.), *Handbook of financial planning for divorce and separation* (pp. 28–48). New York, NY: Wiley Law.
- Silberg, J. L. (2004). The treatment of dissociation in sexually abused children from a family attachment perspective. *Psychotherapy: Theory, Research, Practice, Training*, 41, 487–495. doi:10.1037/0033-3204.41.4.487

- Silberg, J. L. (2013). *The child survivor: Healing developmental trauma and dissociation*. New York, NY: Routledge.
- Smart, C. (2002). From children's shoes to children's voices. *Family Court Review*, 40(3), 307–319.
- Stroud, C. B., Durbin, C. E., Wilson, S., & Mendelsohn, K. A. (2011). Spillover to triadic and dyadic systems in families with young children. *Journal of Family Psychology*, 25, 919–930. doi:10.1037/a0025443
- Tippins, T. M., & Wittman, J. P. (2005). Empirical and ethical problems with custody recommendations: A call for clinical humility and judicial vigilance. *Family Court Review*, 43(2), 193–222. doi:10.1111/j.1744-1617.2005.00019.x
- Waldron, K. H., & Joanis, D. E. (1996). Understanding and collaboratively treating parental alienation syndrome. *American Journal of Family Law*, 10, 121–133. Retrieved from <http://www.fact.on.ca/Info/pas/waldron.htm>
- Wright-McDougal, J. J., & Toriello, P. J. (2013). Ethical implications of confirmation bias in the rehabilitation counseling relationship. *Journal of Applied Rehabilitation Counseling*, 44(2), 3–10. Retrieved from <http://nrca-net.org/jarc.html>
- Young, M. J., Tiedens, L. Z., Jung, H., & Tsai, M. H. (2011). Mad enough to see the other side: The effect of anger on hypothesis disconfirmation. *Cognition and Emotion*, 25, 10–21. doi:10.1080/02699930903534105