

Parental Alienation International

Advancing worldwide understanding in the field of parental alienation

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"THE CHILD IS TOO ALIENATED!" Why Courts Fail to Stop Parental Alienation in Some of the Worst Cases

Shawn A. Wygant, MA

WHEN REVIEWING COURT DECISIONS concerning findings of parental alienation, there are some cases where the court decides not to stop the alienation. This often occurs when the court determines that the child is too alienated—resulting in the termination of the targeted parent–child relationship. For example, in the 1999 Michigan case of *Kreiger v. Kreiger*, the father and mother divorced following a highly contentious custody dispute involving their four minor children. The trial court awarded physical custody to the mother despite extensive expert testimony that she had alienated the children from their father through brainwashing, sabotage of parenting time, and psychological manipulation. The Court of Appeals affirmed the trial court’s decision.

The appellate court openly recognized that the mother had, over several years, severely alienated the children from their father: “There was substantial evidence that defendant over a period of several years alienated the children from plaintiff and plaintiff’s family, spoke derisively of plaintiff to the children, and condoned or encouraged the children to make plaintiff’s visitation time with them difficult and unpleasant.” Despite these findings, the trial court still awarded her physical custody. The court noted that the children displayed extreme negativity toward the father, but emphasized that this hostility was the result of manipulation—not neglect or abuse: “The children deliberately, and apparently with defendant’s tacit or express approval, sabotaged plaintiff’s visitation time by acting up, challenging and disrespecting him.” One child even wrote, “We figured if you can’t trash the house, trash the car!” while describing their efforts to defy their father’s parenting time.

Experts testified that the children believed they could only love one parent without losing the affection of the other: “All the children are imbued with that notion that they can only love one parent without receiving the nonacceptance, the lack of love from their mother as a punitive measure.” Even though the court recognized the alienation and the psychological harm it was causing, it justified awarding custody to the alienating parent based on the belief that parenting time or custody with the father was unlikely to succeed: “In light of the level of negativity the children exhibited toward plaintiff, and the children’s intense emotional attachment to defendant... we affirm the trial court’s custody award because it is questionable whether an award to plaintiff would have any significant chance of succeeding.”

A similar pattern occurred in the more recent case of *In re M.B.* (2023), where a California trial court affirmed a juvenile court’s decision to terminate the father’s reunification services and maintain the child in the mother’s sole care, despite acknowledging that the child had become deeply alienated from her father due to the mother’s conduct. The appellate court affirmed, reasoning that the child’s refusal to reunify rendered further services futile. Both the trial and juvenile courts concluded that reunification was no longer in the child’s best interest, based solely on her unwarranted rejection of her father. The court acknowledged the alienation but—rather than removing the child from the psychologically abusive environment—left her there, effectively rewarding the alienating parent and punishing the targeted parent. The rationale was that separation from the alienating parent would cause more harm than the alienation itself.

In both of these cases, the courts failed to act despite clear evidence of harm resulting from the children’s exposure to parental alienation—ultimately leaving the children in the care of the abusive parent while the non-abusive, targeted parent was permanently erased from their lives. This judicial approach to severe parental alienation has been implicitly supported by some individuals who argue that children should possess a fundamental right to decide whether they want to have a relationship with a parent they do not like, regardless of the underlying reasons (Hoult, 2018). In her 2018 webinar, Jennifer Hoult posited that children have a constitutional and human right to refuse contact with a targeted parent. Others have proposed that a “therapeutic goodbye”

or a “goodbye for now” session is appropriate in cases of entrenched alienation. For example, Fidler and Ward (2017) suggested: “Another option in the most severe cases is to give up on efforts to reunite the parent and child or repair their relationship and suspend the enforcement of court orders for parenting time that is not occurring” (p. 23).

What is often missing from the dialogue surrounding these cases is a careful consideration of the least detrimental alternative. Is terminating the relationship the least harmful choice? Severely alienated children are often very convincing in their diatribes about how traumatized they would be if they were forced to live with the parent they have been poisoned to hate. This is not only a scientific or clinical question; it is a moral one as well. Severely alienated children frequently exhibit pre-conventional moral reasoning in which their judgments are driven primarily by self-interest, fear of punishment, or the pursuit of reward—rather than by empathy, mutual obligation, or long-term relational values. In most cases, this represents a developmental regression. Before the alienation took root, these were children who showed concern and empathy for all family members and believed that only bad people would say bad things about a good person. However, once the child has been brainwashed into a campaign of denigration against the targeted parent, what soon follows is the delusional belief that the targeted parent is “all bad,” evil, and a monster deserving of cruel treatment. It is out of this dynamic that the severely alienated child develops splitting and an absence of guilt for the mistreatment of the targeted parent.

The future development of the severely alienated child’s moral reasoning should be considered in any decision about whether to terminate or protect the child from severe parental alienation. In most cases of severe alienation, the child’s regression in moral reasoning is reversible when protective separation is implemented—just as it would be in cases of severe child maltreatment (Warshak, 2019). Programs like Family Bridges have demonstrated success in recovering children from this psychological condition. In the Family Bridges educational workshop, children learn how to transition from an alienating family dynamic—where loving relationships are framed as conditional, transactional, and loyalty-based—into a healthier relational model. In this new framework, post-conventional moral reasoning helps the child make principled decisions that prioritize integrity, justice, and the preservation of meaningful relationships—even when doing so involves discomfort or personal sacrifice. Severely alienated children, however, are often denied access to these developmental lessons and instead remain trapped in a moral framework that promotes rejection over reconciliation, and conditional affection over secure attachment with their loved, non-abusive parent.

If the courts continue to justify inaction in cases of severe alienation on the grounds that the child is “too alienated,” they risk abandoning children to a psychologically abusive environment that stunts their emotional and moral development. The failure to protect the child from the alienating parent is not a neutral act—it is an active decision to prioritize short-term emotional comfort over long-term psychological health and familial integrity. Rather than surrendering to the false narrative of irreversibility, courts and professionals should intervene and at least try the programs like Family Bridges that help reverse severe alienation instead of giving up when it only appears to be hopeless. ■

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About the Parental Alienation Study Group

Parental Alienation Study Group, Inc. (PASG) is an international, not-for-profit corporation. PASG has 937 members—mostly mental health and legal professionals—from 65 countries. The members of PASG are interested in educating the general public, mental health clinicians, forensic practitioners, attorneys, and judges regarding parental alienation. PASG members are also interested in developing and promoting research on the causes, prevention, evaluation, and treatment of parental alienation.

About Parental Alienation International

Parental Alienation International (PAI) is published bimonthly by PASG. PAI seeks to lead and promote the scholarly discussion and debate concerning parental alienation practice, research, prevention, education, and advocacy to promote development of informed practice and policy in this field.

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