

Parental Alienation International

Advancing worldwide understanding in the field of parental alienation

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The Use of Polygraph Evidence in Cases of Parental Alienation

Shawn A. Wygant, MA

IN THE WORLD OF child abuse investigations that occur during family court proceedings, polygraph examinations are often used to address allegations of sexual abuse. For example, in the recent Texas case of *Interest of I.P.P.* (2025),¹ the mother accused the father of sexually abusing their nine-year-old child. In the course of the investigation by law enforcement, the father took and passed a polygraph. The mother was not happy with the results and continued to subject their child to numerous interviews with the pediatrician, CPS, and a child advocacy center. During a set of hearings on the issue, a CPS worker testified that the parties' child appeared to be repeating what she heard her mother say "because of her word choice" (p. 5).

The mother then motioned the court to be named sole managing conservator. The motion was denied and the mother was ordered to provide the father possession of and access to their daughter. The order allowed the father to pick up the child from school that day. However, the mother immediately went to the school and talked to the child and claimed that the child was upset when she learned that her father was picking her up from school. The mother later returned to the school to give the child an additional cellphone for "emergencies" (p. 6). The child already had a cell phone that the father had provided her. When it came time for the father to pick up the child, a police dispatch called the school and told the principal to lockdown the school because a mother reported that a parent had a gun. Dispatch described a parent fitting Father's description. The principal said, "I'm in the room with him. There is no gun. I've been in the room with him. I walked him into the room." Despite the principal's insistence that Father did not have a gun, she locked down the school. Several officers arrived, surrounded Father, and strip searched him. Officers did not find a gun. Staff observed Mother outside the school videoing with her cellphone when officers arrived.

Even after the father was able to pick up the child and begin his parenting time, within an hour of being home the police arrived because 'someone' called alleging that the child was in distress. The mother admitted she made the call. Because of this chaos created by the mother, the father filed for a temporary restraining order against the mother as well as a counterpetition to modify parent-child relationship requesting sole managing conservatorship. The court granted the restraining order limiting mother's possession of and access to "one day a week, for up to three hours each visit" supervised (p. 7). Eighteen months later a three-day jury trial was held to determine conservatorship. The jury heard testimony from CPS that it was not safe for the child to be in the care of her mother. They reviewed documents from medical records, therapist's notes, CPS records, and text messages as well as an audio recording in which the mother was yelling that she would "make father pay" (Id.). Interestingly, the court of appeals noted that the jury "was free to consider the results of the polygraph" which combined with all the other evidence produced at trial suggested that the mother had fabricated the allegations as part of an overall maladaptive strategy to obtain sole managing conservatorship. While this case did not directly discuss parental alienation, the behaviors of the mother, as noted in the appellate decision, did constitute parental alienation – i.e., making unfounded allegations of abuse (Saini et al., 2020).² More importantly, the testimony of the CPS worker seemed to show that the child was exhibiting the parental alienation syndrome symptom borrowed scenarios (Gardner, 2006).³

¹ *Interest of I.P.P.*, 2025 WL 1284654 (Ct. App. Tex., 2025).

² Saini, M., Laajasalo, T., & Platt, S. (2020). Gatekeeping by allegations: An examination of verified, unfounded, and fabricated allegations of child maltreatment within the context of resist and refusal dynamics. *Family Court Review*, 58(2), 417-431.

³ Gardner, R. A. (2006a). Introduction. In Richard A. Gardner, S. Richard Sauber, and Demosthenes Lorandos (Eds.), *The International Handbook of Parental Alienation Syndrome: Conceptual, Clinical, and Legal Considerations* (pp. 5-11). Charles C. Thomas.

This case also illustrates a common myth among family law attorneys who routinely tell their clients accused of sexual abuse, and who want to take a polygraph examination, that “polygraphs are not admissible.” When a family attorney states this, they are misinforming their client by failing to inform them that polygraph results are routinely discussed and considered in domestic relations cases in a number of important ways. First, they are discussed and considered by law enforcement in their reports.⁴ Second, they are discussed and considered by CPS in their reports.⁵ Third, they are discussed and considered by forensic evaluators in their reports and expert testimony.⁶ Fourth, they are discussed and considered by Lawyer Guardian ad Litem in their reports.⁷ Fifth, they are discussed and considered by judges and juries as noted in the above Texas case.⁸

Although polygraph results are not admissible for the truth of the matter asserted, they are admissible in other ways. For instance, in the Missouri case of *Holmes v. Holmes* (2014), the mother made three claims of sexual abuse that were determined by law enforcement and CPS to be false. Part of the CPS / law enforcement investigation included a review of the father’s passed polygraph exam results. While the results were considered, they were not dispositive. Instead, the investigators relied on a comparative analysis of what was reported to CPS, what was testified to by the mother, and what was actually said by the child. Specifically, there were two allegations of sexual abuse that the mother reported as true involving circumstances that she said never occurred. The first involved a report that the child was sexually abused on a trampoline at a time before the trampoline was purchased. Under cross-examination, the mother was asked about this as shown in the following trial excerpt:

Q. Okay. So [Father] has never been on this trampoline with [Child], right?

A. No, he hasn’t.

Q. And so you’re aware that [Child] made allegations that [Father] had abused her on the trampoline; is that correct?

A. Yes.

Q. Do you believe those allegations?

A. Yes, I do.

Q. Even though [Father] has never been on the trampoline with [Child]?

A. That’s right.

The second involved a report that the child was sexually abused at a circus even though the father never took the child to a circus. The mother testified that even though she knew her daughter never went to a circus with the father she still believed the allegation. The Guardian ad Litem in that case also reviewed the polygraph results and discussed them in his report to the court. CPS reports and/or testimony as well as GAL reports that contain the results of a polygraph test taken by a parent accused of sexual abuse are routinely admitted into the court record as these cases illustrate. Their connection with parental alienation allegations is important because alienating behaviors include making false claims of sexual abuse. Whether or not an alienating parent rightly

⁴ *Guertin v. Guertin*, 870 A.2d 1011 (S. Ct. Ri., 2005).

⁵ *Reel v. Reel*, 147 N.E.3d 1052 (Ind. Ct. App., 2020).

⁶ *In re A.J.*, 877 N.E.2d 805 (Ind. Ct. App., 2007); *Lauer v. Lauer*, 297 A.3d 692 (Super. Ct. Penn., 2023); *Masters v. Masters*, 2024 WL 160117 (Ct. App. Ne., 2024).

⁷ *Holmes v. Holmes*, 436 S.W.3d 599 (Mo. Ct. App., 2014).

⁸ *Doe v. Doe*, 120 Hawaii 149 (Ct. App. Hi., 2009); *In re A.J.*, 877 N.E.2d 805 (Ind. Ct. App., 2007).

or wrongly believes the allegations, or makes them with intent to deceive, a false allegation of sexual abuse is harmful to children and should require a protective response.

In the *Holmes* case the court did take protective action and placed the child with the non-abusive protective parent. In the more recent Pennsylvania case of *Lauer v. Lauer* (2023), the court acknowledged the falsity of a claim of sexual abuse, but failed to protect the child from further harm by allowing the child to remain in the custody of the mother. Initially, the mother made an allegation of sexual abuse and the court entered an order for the father's parenting time to be supervised. After a CYS (Children and Youth Services) and law enforcement investigation concluded that "Mother's allegations were entirely fabricated," the father requested a reconsideration of the supervision order which the court denied. However, the court added: "Father would have a basis to request reconsideration of the supervision requirement by undergoing an evaluation and successfully completing a denial polygraph from Pennsylvania Counseling" (p. 1). The father passed his denial polygraph exam and the results were reviewed and considered by the court in its decision to enter an order for unsupervised partial physical custody. While the court acknowledged the allegation was false, the court failed to protect the child from further risk of harm. Ironically, at the time that case was decided Pennsylvania had a best interests of the child factor that considered "attempts of a parent to turn the child against the other parent" (23 Pa.C.S.A. § 5328) which has since been deleted as of August of 2025.

In the Indiana case of *Reel v. Reel* (2020), the Court of Appeals affirmed the trial court's finding that the mother had coached the parties' child to make false allegations of sexual abuse against the father, constituting parental alienation and emotional harm. The opinion recounted that during therapy, the child stated "it's not true" and that her "mother told her to make the allegations" (p. 1056). The court also noted that both parents submitted to polygraph examinations at the guardian ad litem's request; "Father's results showed no deception," while "Mother's indicated deception" (p. 1057). Following these revelations, the mother admitted to asking leading questions that prompted the child's statements. The trial court found, and the appellate court affirmed, that the mother's conduct was emotionally abusive, had "endangered [the child's] emotional development," and reflected "a pattern of parental alienation" (p. 1058). Custody was transferred to the father, with the mother's parenting time restricted to supervised visits. This is one of several cases of parental alienation where both parents took a polygraph exam and the results supported the findings of fact made by the court after hearing all of the other evidence.

What these cases help illustrate is that polygraph evidence can be useful within the broader context of a thorough investigation that involves a multidisciplinary approach where information is shared among investigatory professionals and the court. The more information the court has to work with the easier their job is to determine facts and make decisions that are in the best interests of the children involved. Although family law attorneys often repeat the mantra that "polygraphs are inadmissible," the case law shows that courts routinely *consider* polygraph results, either directly or indirectly and a careful examination of these cases demonstrates their evidentiary value. Even under modern evidentiary standards, family courts seem to pragmatically recognize the value of polygraph evidence in assessing parental credibility when allegations of sexual abuse are used as a parental alienation tactic in custody disputes. ■



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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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