

Parental Alienation International

Advancing worldwide understanding in the field of parental alienation

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Parental Alienation and the Best Interests of the Child

Shawn A. Wygant, MA

IN ANY CHILD CUSTODY DISPUTE the best interests of the child standard is the overriding concern.¹ It is the rubric under which judges make important decisions about access and custody.² When there is credible evidence of parental alienation, trial courts are increasingly giving consideration to how a child's exposure to parental alienation affects the relevant best interests of the child factors.³ For example, in the recent Maryland case of *Reichert v. Hornbeck* (2023), the trial court determined that the father's parental alienation conduct was contrary to the best interest of the child factors 4, 5, 6, and 15 under MD, Family Law, § 9-201(a). Factors 4, 5, & 6 deal with the child's relationship with each parent, their emotional security and protection from exposure to conflict all of which were implicated in the judge's description of the father's alienating behaviors:

“Dad has enlisted G.R. in a 10 year battle with mom. G.R. at one time refused to call her mom, called her a Devil in human skin, which the Court found very disturbing. The finds that father is unable to foster a relationship between G.R. and his mother, and unable to move forward from endless disparagement and litigation involving the child. All of these things led the Court to make a finding of mental abuse by the father. ... Dad has acted to cause severe parental alienation; has delusional thinking; is paranoid of the courts, the police, the law; and all this is damaging the child. ... He has lied to the child and he has engaged the child in this distorted world.”⁴

Although G.R. expressed a preference to reside with his father, the court discounted that preference after concluding it was the product of parental alienation. Consistent with MD, Family Law § 9-201(a)(15),⁵ the court determined that G.R.'s preference was unreliable. Other courts have made similar determinations. For instance, in the Tennessee case of *McClain v. McClain* (2017) the alienating father claimed on appeal that the trial court erroneously discounted the preference of his children. The court of appeals made it clear that “the skewed nature” of the children's preference was at the heart of “the finding of severe parental alienation” and rather than failing to consider the children's preference, “the trial court's findings demonstrated that it listened closely to B.M.'s and C.M.'s respective testimonies but found that their stated preference was not reasonable ... in light of the vitriolic statements ... made against Mother without a reasonable basis in fact.”⁶ This demonstrates that courts recognize how parental alienation deprives children of their capacity to make decisions regarding their best interests.⁷

In the more recent Michigan case of *Giordana v. Giordana* (2025), under best interests of the child factor (i)⁸ – “the reasonable preference of the child” – the court stated in its findings of fact and conclusions of law that after conducting an in-camera interview of the children, where each children expressed a preference, “the trial court did not find their testimony credible and did find that they were being manipulated by defendant-mother.”⁹

¹ *McIntosh v. McIntosh*, 282 Mich App 471, 475 (Ct. App. Mi., 2009).

² *Shields v. Shields*, 2025 WL 2371779 (Ct. App. Mi., 2025).

³ *Reichert v. Hornbeck*, 2023 WL 3773369 (Ct. App. Md., 2023).

⁴ *Id.* at 6-7.

⁵ “the child's preference”

⁶ *McClain v. McClain*, 539 S.W.3d 170, 207 (Ct. App. Tn., 2017).

⁷ Rosen, J. (2013). The Child's Attorney and the Alienated Child: Approaches to Resolving the Ethical Dilemma of Diminished Capacity. *Family Court Review*, 51(2), 330-343.

⁸ MCL 722.23(i)

⁹ *Giordana v. Giordana*, 2025 WL 1511303, *9 (Ct. App. Mi., 2025).

Two additional best interests of the child factors, (f) and (j), were dispositive in the court’s decision to award sole legal custody of the children to the targeted parent. Factor (f) involves the moral fitness of the parties. The court reasoned that this factor favored the father due to the mother’s “engagement in parental alienation.”¹⁰ The implication is that when the mother engaged in making false claims of abuse against the father in a sustained effort to deny him access and parenting time, the court considered that behavior immoral and repugnant. Factor (j) involves “the willingness and capacity to facilitate and close and continuing relationship between the child and the other parent.”¹¹ However, factor (j) also states that when a parent is withholding children from the other parent for legitimate protective reasons their lack of willingness to facilitate the relationship cannot be held against them. In this particular case, the trial court found that the mother’s allegations of abuse against the father were manufactured as part of a campaign of denigration and her withholding of the children for what the court determined were non-protective reasons supported a finding that she was not willing to facilitate the children’s relationship with their father.

Factor (j) has consistently been correlated with parental alienation. For instance in the case of *McNutt v. McNutt* (2015), the trial stated that factor (j) is the “cooperation factor ... and that’s been huge in this case. ... What mom has done in this court’s opinion, as I’ve said several times now, is done everything she can to destroy the relationship between these girls and their father.”¹² In the 2025 case of *Skowron v. Skowron*, the Michigan Court of Appeals affirmed the trial court’s custody determination awarding: Sole physical custody to the mother (Ewelina Skowron); Restricted parenting time to the father (Mariusz Skowron); and Prohibition on international travel with the children absent court approval. The appellate court upheld the custody ruling primarily because the father engaged in sustained parental alienation, particularly through text-message coaching and encouragement of the child to undermine, defy, and emotionally attack the mother. The Court characterized factor (j)—the willingness to encourage the child’s relationship with the other parent—as “very significant” and found that the father’s conduct affirmatively damaged the children’s relationship with the mother noting: “There’s no question in this case based on the exhibits that I have reviewed that I do believe parental alienation is going on.” In speaking to the defendant father, the court continued: “You testified under oath that you are not disparaging in any way to mother and that you’re not encouraging the bad behavior, and the text messages show that that testimony was false.”¹³ The court read into the record some of those text messages from the father to one of the children: “Great. Let her break down. Let her know that she can’t win against three of us,” “Don’t go anywhere with her for the weekend until she gives in,” “Keep fighting as much as you can. Don’t give in even one step,” “I hope she goes crazy today thanks to you.” The disparagement against the mother also included claims by the father to the children that the mother “cheated” on him during the marriage and “stole” the marital home from him.

It is clear from an examination of parental alienation case law that courts have been integrating credible evidence of parental alienation into their best interests of the child determinations, particularly where the children’s expressed preferences and emotional security within the targeted parent-child relationship have been compromised by the alienating parent’s conduct. This demonstrates that when courts are presented with compelling evidence that clearly preponderates in favor of a finding of parental alienation, they take appropriate protective action to safeguard the children’s best interests. ■

¹⁰ Id. at 10.

¹¹ MCL 722.23(j)

¹² *McNutt v. McNutt*, 2015 WL 8967327, *9 (Ct. App. Mi., 2015).

¹³ *Skowron v. Skowron*, 2025 WL 3714357, *2 (Ct. App. Mi., 2025)

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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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