

Parental Alienation International

Advancing worldwide understanding in the field of parental alienation

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Parental Alienation and its Admissibility under *Frye* and *Daubert*

Shawn A. Wygant, MA

THE CONSTRUCT OF PARENTAL ALIENATION has long been recognized as a real phenomenon in the scientific literature¹ and relevant case law.² Yet, despite this recognition there are some legal and mental health professionals who still refer to parental alienation as “controversial”³ or “inadmissible.”⁴ For example, Myers and Mercer (2022) suggest that parental alienation was controversial “from the outset” and that parental alienation syndrome “was specifically created as a rationale for rejecting child sexual abuse claims.”⁵ With respect to the claim that parental alienation is controversial, Harman et al. (2022) noted that disputes regarding the scientific status of parental alienation are “red herring debates.”⁶ Their comprehensive review identified 213 studies containing empirical data on parental alienation and concluded that the field had progressed beyond an early developmental stage and has produced a “scientifically trustworthy knowledge base.”⁷ The authors further concluded that “the scientific status of parental alienation research is not underdeveloped.”⁸ With respect to the claim by Myers and Mercer (2022) that parental alienation syndrome was created by abusive fathers to take custody away from protective mothers, Gardner (1987),⁹ as well as many others, has made it clear that parents embroiled in custody disputes will make true and false claims of child sexual abuse and that whenever there are true claims of abuse, of any kind, there is no parental alienation or parental alienation syndrome claim.

Admissibility of Parental Alienation under *Frye*¹⁰

When it comes to the admissibility of parental alienation, Rao (2021) argued that its admission “does not meet the evidentiary standards necessary for expert opinion evidence to be admissible in family court.”¹¹ She further opined that “parental alienation is not admissible under the *Frye* standard because it fails the general admissibility test.”¹² Courts applying the *Frye* general-acceptance standard have admitted expert evidence concerning parental alienation after finding that the underlying scientific evidence was sufficiently accepted within the rele-

¹ Baker, A. J. L., & Darnall, D. (2006). Behaviors and strategies employed in parental alienation: A survey of parental experiences. *Journal of Divorce & Remarriage*, 45(1/2), 97-124; Meland, E., Furuholmen, D., & Jahanlu, D. (2024). Parental alienation—A valid experience? *Scandinavian Journal of Public Health*, 52(5), 717–725.

² *Interest of I.P.P.*, 2025 WL 1284654 (Ct. App. Tex., 2025); *Reel v. Reel*, 147 N.E.3d 1052 (Ind. Ct. App., 2020).

³ Myers, J. E. B., & Mercer, J. (2022). Parental alienation in family court: Attacking expert testimony. *Child and Family Law Journal*, 10(1), 68–111.

⁴ Rao, A. G. (2021). Rejecting “unjustified” rejection: Why family courts should exclude parental alienation experts. *Boston College Law Review*, 62(5), 1759–1796. Page 1759.

⁵ Myers and Mercer (2022) at 78.

⁶ Harman, J. J., Warshak, R. A., Lorandos, D., & Florian, M. J. (2022). Developmental psychology and the scientific status of parental alienation. *Developmental Psychology*, 58(10), 1887–1911. Page 1891.

⁷ *Id.* at 1887.

⁸ *Id.* at 1895.

⁹ Gardner, R. A. (1987). *The parental alienation syndrome and the differentiation between fabricated and genuine child sex abuse*. Creative Therapeutics.

¹⁰ *Frye v. United States*, 293 F. 1013 (D.C. Cir. 1923).

¹¹ Rao (2021) at 1763.

¹² *Id.* at 1789.

vant scientific community. In *H.L.J. v. R.G.J.* (2020),¹³ the father specifically challenged expert parental alienation testimony on the ground that the methodology was not generally accepted in the scientific community. The Pennsylvania Superior Court rejected that challenge. In doing so, the court recognized parental alienation as “a recognized specialty within the field of family therapy” and determined that the scientific methodology employed by the expert was “generally accepted in the community of specialists who diagnose and treat parental alienation.”¹⁴ The court consequently held that the expert’s “methodology passes the *Frye* test” and affirmed the trial court’s admission of her testimony.¹⁵

A similar general-acceptance determination occurred in *In re Marriage of Bates* (2004).¹⁶ There, the trial court conducted an evidentiary *Frye* hearing specifically addressing Parental Alienation Syndrome (PAS). The proponent presented three expert witnesses and 136 articles from peer-reviewed publications, while the opposing party presented no witnesses or exhibits. The experts testified that PAS was generally accepted within the relevant psychological and psychiatric communities, and the trial court expressly found “that the principle of Parental Alienation Syndrome is sufficiently established to have gained general acceptance in the particular field.”¹⁷ The Illinois Supreme Court subsequently observed that the evidence before the trial court established that PAS had been described in peer-reviewed literature dating to the late 1980s and that “the only evidence the trial court heard was that it is generally accepted in the field of psychology.”¹⁸ Although the trial court ultimately based its custody determination on the statutory evidence of interference with the parent-child relationship rather than the PAS label itself, the Illinois Supreme Court nevertheless concluded that, given the record presented at the *Frye* hearing, “allowing Dr. Gardner’s parental alienation syndrome testimony was not an abuse of discretion.”¹⁹ Thus, *H.L.J.* and *Bates* provide examples of courts admitting parental alienation and parental alienation syndrome expert evidence after the *Frye* general acceptance requirement was directly litigated and satisfied on the evidentiary record before the court.

Admissibility of Parental Alienation under *Daubert*²⁰

Rao (2021) makes an equally categorical assertion concerning the admissibility of parental alienation evidence under the *Daubert* standard, stating: “Under the *Daubert* standard, too, parental alienation testimony is inadmissible.”²¹ After considering the individual *Daubert* factors, Rao further concluded that “courts employing that test should not accept parental alienation testimony.”²² However, this categorical assertion is difficult to reconcile with cases in which courts applying *Daubert* factors have expressly admitted parental alienation expert testimony. In *J.H. v. J.D.* (2017),²³ the Delaware Family Court expressly considered the admissibility of

¹³ *H.L.J. v. R.G.J., Jr.*, 2020 WL 4334055 (Pa. Super. Ct. 2020).

¹⁴ *Id.* at *4 & *5.

¹⁵ *Id.* at *5.

¹⁶ *In re Marriage of Bates*, 212 Ill. 2d 489, 819 N.E.2d 714 (2004).

¹⁷ *Id.* at 501–03, 819 N.E.2d at 721–22.

¹⁸ *Id.* at 516, 819 N.E.2d at 729.

¹⁹ *Id.* at 518, 819 N.E.2d at 730.

²⁰ *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993).

²¹ Rao (2021) at 1790.

²² *Id.* at 1791.

²³ *J.H. v. J.D.*, 2017 WL 4403331 (Del. Fam. Ct. Aug. 29, 2017)

expert psychological testimony concerning parental alienation under *Daubert*. The court evaluated the expert's qualifications, the relevance of his opinions, and the reliability of the methods underlying his evaluation and concluded that the expert had "offered relevant evidence based upon reliable methods."²⁴ The court therefore admitted the expert's testimony and report, which included opinions that the parent had engaged in alienating behaviors intended to undermine the child's relationship with the other parent and that such conduct could have significant adverse effects on the child. Thus, unlike assertions that parental-alienation evidence is categorically inadmissible under *Daubert*, *J.H.* demonstrates that a court applying *Daubert* admitted expert parental alienation evidence after determining that the expert was qualified and that his opinions were relevant, reliable, and based upon sufficiently reliable methods.

More recently, the Nebraska Court of Appeals addressed a direct *Daubert* challenge to parental-alienation testimony in *Larson v. Larson* (2025).²⁵ The father sought to exclude the testimony of psychologists who offered opinions concerning parental alienation, characterizing the subject as 'junk science' because parental alienation is not a diagnosis contained in the DSM-5. The opposing party responded that parental alienation was not being offered as a psychiatric diagnosis, but rather as "a descriptive form of behavior that can be recognized by experts."²⁶ The district court denied the *Daubert* motion, finding that the father had failed to satisfy his initial burden of sufficiently calling into question the reliability or validity of the anticipated expert testimony. The court further concluded that his objections went to the "weight of the evidence, not its admissibility," and could therefore be explored through cross-examination.²⁷ The parental-alienation evidence was consequently admitted, and the psychologist testified regarding a five-factor model for assessing parental alienation and identified specific alienating behaviors. The appellate court affirmed the custody determination and expressly relied upon the child's "exhibited signs of parental alienation" and the father's conduct that "allowed for her alienation."²⁸ Accordingly, *Larson* provides recent appellate authority rejecting an attempt to exclude parental-alienation expert evidence as 'junk science' under *Daubert* and treating challenges to that evidence, on the record presented, as matters of evidentiary weight rather than admissibility.

Conclusion

What these cases demonstrate is that trial courts regularly admit parental alienation evidence in family law cases where it has been shown to assist a trier of fact in understanding how and why parents alienate their children and what evidence-based methods of intervention are most helpful to stop the alienation. They also unmask the "red herring" arguments of the parental alienation detractors who continue to deny that parental alienation exists or that it only exists in "pure" cases where the alienator is diabolically evil and the targeted parent is so saintly they are a candidate for beatification. ■

²⁴ *Id.* at *7.

²⁵ *Larson v. Larson*, 33 Neb. App. 609, 23 N.W.3d 670 (2025).

²⁶ *Id.* at 618.

²⁷ *Id.* at 619.

²⁸ *Id.* at 640.

Contact Information for PASG Officers and PAI Editors

Mailing Address

Parental Alienation Study Group
P.O. Box 4090
Brentwood, TN 37027, USA

Board of Directors

Phillip Hendrix, MA, MBA, President
Castle Rock, Colorado, USA
phillip@covenantcounselors.com

Phillip Hendrix, MA, MBA, Treasurer
Castle Rock, Colorado, USA
phillip@covenantcounselors.com

Brian Hart, MBA, MS, Secretary
Needham, Massachusetts, USA
Brianhart123@gmail.com

Kelley Baker, PhD
Georgetown, Texas, USA
kabakerphd@gmail.com

William Bernet, MD, Past President
Nashville, Tennessee, USA
william.bernet@vumc.org

Alan D. Blotcky, PhD
Birmingham, Alabama, USA
alanblotcky@att.net

J. Michael Bone, PhD
Winter Park, Florida, USA
michael@jmichaelbone.com

Ben Hine, PhD
London, UK
Ben.Hine@uwl.ac.uk

Stan Korosi, PhD
Melbourne, Australia
skorosi@usc.edu.au

Jesper, Lohse, MBA
Denmark
chairman@worldparents.org

Editors-in-Chief

Diana Alberter
Pittsburgh, Pennsylvania, USA
dmalberter@gmail.com

Alan D. Blotcky PhD
Birmingham, Alabama, USA
alanblotcky@att.net

Managing Editor

Tom Janssen
Antwerp, Belgium
tomjanssen@outlook.com

Column Editors

Targeted Parents' Column

Editor: Diana Alberter
Pennsylvania, USA
dmalberter@gmail.com

Interventions Column

Editors: Mary Alvarez, PhD, &
Chris Turner
Texas, USA
dralvarez@resetting-the-family.com
cturner@resetting-the-family.com

Legal Column

Editor: Shawn Wygant, MA
Oscoda, MI
swygant@psychlaw.net

Book Review Editor

Brian Hart, MBA, MS
Needham, Massachusetts, USA
Brianhart123@gmail.com

Events Editor

Robin Bradfield, MA
Arizona and Nebraska
Robinbradfield22@gmail.com

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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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