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**Re: Rejoinder Dated 16.04.2026 - Notice of Formal Investigative Procedure**

1 message

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Keith Head <khead4@alumni.uwo.ca>  
To: IJRAH Journal <mail2ijrah@gmail.com>, editor@ijrah.com

Fri, Apr 24, 2026 at 4:14 PM

Dear Editors and Advocate Raghvendra Pratap Singh,

Dear IJRAH Journal,

Before addressing the specific allegations, I note that the concerns raised in the PASG rejoinder, even if meritorious, do not meet any of the grounds for retraction set out in the COPE Retraction Guidelines (2019), and are properly addressed through published response or targeted corrigenda rather than retraction. In response to the specific allegations of specific factual inaccuracies, please note that all three sentences are supported by the peer-reviewed literature and consistent with the interpretive synthesis methodology of a narrative review. I have addressed each point below and listed supporting references. Regardless, I have proposed a corrigendum for sentences (i) and (ii) should the journal wish me to implement one. Please note: my willingness to support targeted corrigenda is offered to the journal rather than to the complainants, who have already refused this remedy. If agreeable, please let me know and I can begin revisions immediately.

**(i) The assertion that "Gardner avoided peer-review while creating an appearance of third-party validation" which ignores documented peer reviewed history;**

The sentence characterizes Gardner's publication pattern, not the absence of peer review. I will also note the article on page 64 further acknowledges that some of Gardner's early work was valuable, which PASG's characterization of the passage omits. Gardner's foundational PAS works, including the 1987 and 1992 texts, were published through Creative Therapeutics, which he owned. Houchin et al. (2012) characterized this self-publishing and self-citation practice as frankly misleading. Hoult (2006) documented that peer-reviewed work constituted a minority of Gardner's PAS-specific output. The listed articles PASG provided are mostly later commentaries and clinical applications, not independent validation of the foundational construct. Interpretive synthesis of documented sources is a standard and accepted feature of narrative review methodology (Greenhalgh et al., 2018).

However, I offer a corrigendum grounding the characterization directly in Houchin et al. (2012) if the journal finds it useful.

**Proposed phrasing:** Gardner published his foundational PAS works through Creative Therapeutics, his own company, bypassing external peer review. Houchin et al. (2012) characterized this practice of self-publishing and self-citation as frankly misleading.

**Supporting references:**

Greenhalgh, T., Thorne, S., and Malterud, K. (2018). Time to challenge the spurious hierarchy of systematic over narrative reviews? *European Journal of Clinical Investigation*, 48(6), e12931.

Houchin, T. M., Ranseen, J., Hash, P. A. K., and Bartnicki, D. J. (2012). The parental alienation debate belongs in the courtroom, not in DSM-5, *Journal of the American Academy of Psychiatry and the Law*, 40(1), 127 to 131. Note, this source is already cited in the published article.

Hoult, J. (2006). The evidentiary admissibility of parental alienation syndrome, *Science, law, and policy, Children's Legal Rights Journal*, 26(1), 1 to 61.

**(ii) The claim that "While PAS provides a possible explanation for a breach in relationship between a child and a parent, it ignores evidence that children may have valid reasons for rejecting a parent." which misrepresents the fundamental diagnostic criteria of the theory;**

The sentence describes a recognized diagnostic limitation that applies across formulations of the theory, not a misrepresentation. Gardner's original framework, Kelly and Johnston's reformulated parental alienation, and later models including the five-factor approach all require the evaluator to determine that rejection is without legitimate justification, yet none provide an independent method for making that determination. Gardner identified the presence of PAS itself as a differentiating criterion for distinguishing true from false abuse claims (Meier, 2009, citing Gardner,

1987, p. 109), producing the circularity where PAS is used to determine whether abuse claims are valid while the validity of abuse claims is needed to determine PAS. Bruch (2001) identified the same structural problem. Kelly and Johnston (2001) reformulated PAS specifically because Gardner's framework did not adequately distinguish alienation from justified estrangement rooted in abuse, neglect, or harmful parenting, yet their reformulation inherits the same evidentiary gap. Proponent literature restating the abuse exclusion criterion does not resolve this gap, a point addressed in the peer-reviewed critical literature (Milchman, Geffner, and Meier, 2020). The sentence, therefore, is accurate and supported. As above, interpretive synthesis of documented sources is a standard and accepted feature of narrative review methodology (Greenhalgh et al., 2018).

However, while the sentence as written is defensible and supported by the peer-reviewed critical literature, I offer a corrigendum rephrasing it.

**Proposed phrasing:** While PAS provides a possible explanation for a breach in relationship between a child and a parent, it does not adequately account for evidence that children may have valid reasons for rejecting a parent.

**Supporting References:**

Bruch, C. S. (2001). Parental alienation syndrome and parental alienation, Getting it wrong in child custody cases, *Family Law Quarterly*, 35(3), 527 to 552.

Greenhalgh, T., Thorne, S., and Malterud, K. (2018). Time to challenge the spurious hierarchy of systematic over narrative reviews? *European Journal of Clinical Investigation*, 48(6), e12931.

Kelly, J. B., and Johnston, J. R. (2001). The alienated child, A reformulation of parental alienation syndrome, *Family Court Review*, 39(3), 249 to 266.

Meier, J. S. (2009). A historical perspective on parental alienation syndrome and parental alienation, *Journal of Child Custody*, 6(3 to 4), 232 to 257.

Milchman, M. S., Geffner, R., and Meier, J. S. (2020). Ideology and rhetoric replace science and reason in some parental alienation literature and advocacy, A critique, *Family Court Review*, 58(2), 340 to 361.

**(iii) The statement regarding "Perhaps most significant is the consistent refusal of major medical, psychiatric, and psychological professional organizations to recognize PAS as a legitimate theory or diagnostic criterion" which is factually contradicted by existing medical and psychological literature.**

The sentence accurately reflects the status of PAS in the major diagnostic systems and formal recognition practices of professional organizations. In fact, the article's characterization is supported by the most recent organizational positions in the record, several of which postdate the sources PASG cites. The DSM has never included PAS or parental alienation as a diagnosis. The WHO removed parental alienation from the ICD-11 in 2020, stating it is not a health care term and that no evidence-based interventions specifically for it exist. The APA 2008 statement confirms no official position on the purported syndrome and notes the 1996 Task Force found a lack of supporting data. PA proponents sometimes point to the inclusion of parent-child relational problem in the DSM as evidence of recognition, but this is a relational V-code describing a clinical focus of attention, not a validated diagnostic construct, and it is not specific to alienation. Conflating a generic relational code with recognition of PAS as a discrete diagnostic entity misrepresents both what the DSM contains and what the article claims.

The sources PASG cites do not establish diagnostic recognition. The AACAP 1997 Practice Parameters list parental alienation among many factors an evaluator considers alongside sibling relationships and religion. The AAP 2016 report mentions alienation descriptively in general divorce guidance. The APA 2022 Guidelines reference alienating behaviors as one factor consistent with the 2008 statement. The AFCC-NCJFCJ 2022 Joint Statement explicitly declines to apply a single diagnostic label, warns against gendered assumptions that either alienation or intimate partner violence is determinative, and lists alienating behaviors among many possible factors. Practice guidelines are not diagnostic recognition.

The article's characterization is, if anything, conservatively phrased relative to what the cited sources actually say. The NCJFCJ 2021 Judicial Guide to Child Safety in Custody Cases states directly that the theory positing the existence of PAS has been discredited by the scientific community, refers repeatedly to the discredited diagnosis of PAS, and concludes that testimony regarding PAS should be ruled inadmissible under both Daubert and Frye evidentiary standards. The APSAC 2023 statement describes it as negligent, even reckless for professionals to lend credence to a diagnosis of parental alienation. The UN Special Rapporteur's 2023 report characterizes parental alienation as a pseudo-concept lacking empirical validity.

**Supporting references:**

All cited sources are already in the article's bibliography and/or in PASG's rejoinder.

All the best,

On Mon, Apr 20, 2026 at 2:33 PM Keith Head <khead4@alumni.uwo.ca> wrote:

Dear Editors and Advocate Raghvendra Pratap Singh,

I thank you for your response and appreciate the journal's careful handling of this matter given the pressure PASG has placed on the editorial process. I understand the article is under Formal Internal Review and wish to address the specific allegations set forth in the PASG rejoinder dated April 16, 2026.

Below is a point-by-point response to each allegation in the rejoinder. Where the article is defensible as written, I stand by it. Where a narrow wording adjustment would refine attribution without altering the substance, I note where an optional corrigendum could be offered. In no scenario would any of the proposed refinements alter the article's conclusions. The substantive findings regarding the scientific legitimacy of PAS, the correlation between PA allegations and documented domestic violence, the harms to children when courts credit PA claims, and the need for heightened judicial skepticism all remain intact and supported by peer-reviewed literature regardless of whether corrigenda are issued. Any corrections I am open to reflect standard editorial refinement and should not be read as validation of the rejoinder's allegations or framing.

### **1. On the allegation of scientific fraud through selection bias.**

The rejoinder characterizes the article as fraudulent because it cited sixteen critics and few proponents. Fraud under ORI, COPE, and UGC definitions means fabrication, falsification, or plagiarism. A narrative review does not generate data and cannot fabricate or falsify data. Selection of sources under stated inclusion criteria is the methodology of a narrative review, not fraud. The article discloses its inclusion criteria in Section II and acknowledges the resulting selection approach in its limitations section. Disagreement about review scope is properly addressed through a competing review or letter to the editor, not retraction. See below about additional allegations regarding selection. The article stands as written.

### **2. On the allegation that academic freedom does not shield fabrication through systematic exclusion of over 1,000 sources.**

The article does not claim no peer-reviewed literature on parental alienation exists, nor does it exclude proponent perspectives. The article cites and engages with proponent and proponent-adjacent sources including Gardner himself (1987, 1992, 1999, 2001), Kelly and Johnston (2001), Johnston (2003), Johnston and Kelly (2004), Rueda (2004), Friedlander and Walters (2010), and Saini et al. (2016). That the article does not include the complainants' preferred sources is not equivalent to excluding proponent perspectives, it reflects the review's stated inclusion criteria and analytic focus. The claim the article actually makes is narrower, that no controlled studies have validated PAS as a construct and that Gardner's claims have not been independently replicated. The existence of review articles like Harman et al. (2022) does not contradict this, since reviews are not independent empirical validation. Exclusion of sources from a narrative review is not fabrication, which by definition requires making up data or results.

The article's focus was deliberately limited to controlled studies, because controlled methodology is the standard by which construct validity is established in psychological science. I acknowledge a handful of construct validation studies do exist in the PA proponent literature outside this threshold. None are controlled, and most suffer from documented methodological problems including selection bias, absence of comparison groups, reliance on convenience samples drawn from PA-affirming clinical practices, and circular definitions where the construct is defined by the same behaviors the study claims to measure. If the complainants would like these studies integrated into a revised version, I would be glad to discuss them in the article, noting both their existence and their limitations. A corrigendum adding a sentence or paragraph to that effect is an option I am open to if the journal considers it useful. Otherwise, the article stands as written.

### **3. The article makes false statements about Gardner's publications in peer-reviewed journals, specifically the sentence stating that Gardner avoided peer-review while creating an appearance of third-party validation, and the eighteen listed articles prove this is false.**

The article on page 64 states that Gardner published much of his work through his own press or in non-scientific journals, and acknowledges that some of his early work was valuable. The phrase **much of his work**, rather than all of his work, is an explicit concession that Gardner also published in peer-reviewed venues. The rejoinder quotes the article selectively and omits these qualifiers. The article's accurate claim is that Gardner's foundational PAS formulation was introduced through self-published Creative Therapeutics books in 1987 and 1992, which is factually correct and documented by Bruch (2001) and Houchin et al. (2012), both peer-reviewed sources already cited. The

articles listed in the rejoinder are predominantly commentaries and clinical applications published **after** the foundational works had already been disseminated.

One phrase could be more conservatively attributed. The sentence describing Creative Therapeutics as appearing to be an independent publisher and creating an appearance of legitimate third-party validation is a reasonable inference from Bruch (2001) and Houchin et al. (2012), and interpretive synthesis of this kind is a standard feature of narrative reviews rather than a defect. That said, the characterization could be grounded more directly in the sources rather than stated in the author's voice. A corrigendum could rephrase this to attribute the characterization to Houchin et al. (2012), who wrote that Gardner's approach of self-publishing books and then citing himself as an authoritative reference went beyond self-aggrandizement and was frankly misleading. Proposed rewording: Gardner published his foundational PAS works through Creative Therapeutics, his own company, bypassing external peer review. Houchin et al. (2012) characterized this practice of self-publishing and self-citation as frankly misleading. This preserves the substantive claim while grounding the characterization in a peer-reviewed source.

#### **4. On the allegation of false statements regarding reasons for a child's contact refusal.**

The article does not claim that PA proponents have ignored differential diagnosis of contact refusal. The article states that PA theory provides a possible explanation for parent-child relationship breakdown but ignores evidence that children may have valid reasons for rejecting a parent. This is a critique of the theory's emphasis, not a denial that proponents have written about differential diagnosis. The rejoinder's list of Bernet decision trees and five-factor models demonstrates that proponents have addressed differential diagnosis, which the article does not dispute. What the article disputes is whether these instruments reliably distinguish alienation from justified estrangement, and this is supported by Saini et al. (2016), already cited, who acknowledge that no reliable instruments exist for this purpose. The article stands as written.

#### **5. On the allegation of false statements regarding professional organization acceptance.**

The article claims that major medical, psychiatric, and psychological organizations have declined to recognize PAS as a legitimate theory or diagnostic criterion. The rejoinder's list of organizations that have published documents mentioning parental alienation does not contradict this. A practice parameter or guideline that discusses alienation behaviors as factors in custody disputes is not endorsement of PAS as a diagnostic criterion.

The article's characterization is, if anything, conservatively phrased relative to what the cited sources actually say. The NCJFCJ 2021 Judicial Guide to Child Safety in Custody Cases states directly that the theory positing the existence of PAS has been discredited by the scientific community, refers repeatedly to the discredited diagnosis of PAS, and concludes that testimony regarding PAS should be ruled inadmissible under both Daubert and Frye evidentiary standards. The APSAC 2023 statement describes it as negligent, even reckless for professionals to lend credence to a diagnosis of parental alienation. The UN Special Rapporteur's 2023 report characterizes parental alienation as a pseudo-concept lacking empirical validity. The WHO explicitly removed parental alienation from the ICD-11 classification index in 2020, stating it is not a health care term. The DSM has declined inclusion in every edition since PAS was first proposed. PA proponents sometimes point to the inclusion of parent-child relational problem in the DSM as evidence of recognition, but this is a relational V-code describing a clinical focus of attention, not a validated diagnostic construct, and it is not specific to alienation. Conflating a generic relational code with recognition of PAS as a discrete diagnostic entity misrepresents both what the DSM contains and what the article claims.

Acknowledging that alienation behaviors are discussed in custody contexts is not the same as recognizing PAS as a validated diagnostic construct, and the rejoinder blurs that distinction. The article stands as written.

#### **6. On the additional statements identified as false in paragraph 7.**

The six statements listed are either direct paraphrases of cited sources or accurate characterizations of the evidence presented. The claim of a prevailing consensus among experts is supported by Milchman (2019), Willis and O'Donohue (2018), and the professional organization statements already cited. The claim that no controlled studies have supported the theory is supported by Meier (2009) and Mooney (2024). The failure to distinguish alienation from justified estrangement is supported by Saini et al. (2016). The 58,000 children estimate is cited directly to Meier (2020). The harms of reunification programs are documented by Dreyfus (2023) and Mercer (2019, 2022). The claim that PA treatment advocates have failed to provide empirical support for their methods is a direct paraphrase of Mercer's published conclusion. Each of these statements is grounded in a cited source. Disagreement with the cited sources is a dispute with those sources, not evidence of false statements in this article. The article stands as written.

#### **7. On the framing in paragraph 8 that the author started with a preconceived bias.**

This is speculation about the author's mental state and does not constitute a ground for retraction under any recognized framework. The article took a critical approach to examining how the PAS construct emerged, whether it

has been subjected to **peer-reviewed controlled studies** that are **reproducible**, and what the empirical results demonstrate about the outcomes when the construct is applied in practice. This is a standard analytic framework for evaluating the validity of a psychological construct, not evidence of predetermined conclusions. My published work spans multiple areas and frequently examines the national or long-term implications of policies, practices, and constructs, which is precisely what this review does in tracing the emergence of PAS, its application in family courts, and its downstream consequences for children and protective parents. The characterization of preconceived bias is a strong allegation to make without grounding it in anything beyond the article's conclusions being unfavorable to the complainants' preferred position. The article's methodology and limitations are disclosed transparently. The rejoinder's characterization of secondary sources as a scholarly echo chamber is a rhetorical framing, not a factual allegation. The article stands as written.

#### **8. On the COPE retraction grounds.**

COPE's 2019 Retraction Guidelines reserve retraction for unreliable findings due to misconduct or honest error, plagiarism, redundant publication, unethical research, compromised peer review, undisclosed conflicts of interest, or failure to obtain authorizations. None of these grounds are established by the rejoinder. Disagreement with a narrative review's scope, selection, or conclusions is addressed through published response, corrigenda for specific factual errors, or competing scholarship, not retraction. The appropriate remedies for the concerns raised in the rejoinder are, first, a published letter to the editor or commentary by the complainants presenting their counterarguments. Second, another remedy is a narrow corrigendum. I am willing to submit proposed corrigendum's identified above if the journal considers that appropriate.

#### **9. On the IT Rules 2021 and BNS 356 claims.**

These legal claims rest on the premise that the article defames Mr. Hendrix or Dr. Bernet. Neither is named or referenced in the article. The subject of the article's critical discussion is Richard Gardner, who is deceased, and the construct of parental alienation. Indian defamation law requires the imputation to concern the complainant. A person cannot sue for defamation of a theory they endorse or a deceased figure whose work they defend. Without a viable defamation predicate, the IT Rules due diligence obligations are not triggered, and the safe harbor analysis does not apply. The administrative threat to petition UGC-CARE is moot because UGC-CARE was dissolved on October 3, 2024.

#### **Summary of position:**

I stand by the article substantively. I note that the rejoinder explicitly rejects the journal's prior offer of corrigenda or response letter/article and insists on retraction as the only acceptable outcome. My willingness to support targeted corrigenda is offered to the journal rather than to the complainants, who have already refused this remedy. The corrigenda I propose address specific points on their merits, not as negotiation with complainants who have declined to negotiate.

Minor corrigenda are available if the journal considers them useful. First, the sentence on page 64 describing Creative Therapeutics as appearing to be an independent publisher could be tightened to attribute the misleading-appearance characterization directly to Houchin et al. (2012), which preserves the substantive claim while grounding it in a peer-reviewed source. Second, a sentence or paragraph could be added acknowledging that a handful of construct validation studies exist in the PA proponent literature outside the controlled-studies threshold, noting their methodological limitations. I am willing to submit either or both corrections if the journal requests them.

That said, in my view the complainants are not operating in good faith. The rejoinder repeatedly mischaracterizes the article's actual text, selectively quotes around qualifiers that undermine its allegations, invokes fraud as a rhetorical frame rather than a definable standard, raises legal claims with no standing predicate, and threatens administrative action through a regulatory body (UGC-CARE) that was dissolved eighteen months ago. The pattern suggests the goal is retraction through procedural pressure rather than correction of identifiable errors. This is a documented strategy as previously mentioned. The Collective Expert Academic Response hosted by the Rackman Center at Bar Ilan University (2023) also have noted that reports have been received from a number of countries of attempts by alienation proponents to pressure academic institutions into disciplining and/or firing faculty members who question or critique parental alienation concepts, characterizing this as behavior indicative of harassment campaigns aimed at suppressing and penalizing dissent.

All the best,  
Keith Robert Head

On Mon, Apr 20, 2026 at 12:03 PM IJRAH Journal <[mail2ijrah@gmail.com](mailto:mail2ijrah@gmail.com)> wrote:

Madam,

We are in receipt of your Rejoinder and have noted its contents. Be advised that M/s Stallion Publication operates under established international protocols for academic integrity and will not be coerced into summary censorship by arbitrary 48-hour deadlines.

Our client's position is as follows:

### **1. Rejection of the "Fraud" Narrative**

Your clients' claim of "fraudulent data" is legally and scientifically unsupported. Under the COPE (Committee on Publication Ethics) framework, "data fabrication" refers to the invention of empirical results, not an author's selection of secondary sources in a Critical Review. The author has verified that every claim made is supported by peer-reviewed citations, including primary source documents from the WHO, APA, and UN.

### **2. Failure of Regulatory Threats**

We note your threat to petition the "UGC-CARE Cell" for de-listing. We find this threat to be factually hollow, as the UGC-CARE listing system was discontinued in early 2025. Such a request to a non-existent regulatory process further highlights the vexatious nature of this demand.

### **3. Pattern of Harassment**

It has come to our attention that your clients have a documented history of attempting to suppress critical scholarship through legal pressure on publishers rather than scholarly response—notably in their failed campaigns against Joan Meier (2021) and the publisher Routledge (2023). Reputable publishers have consistently declined these demands as they violate the core principles of academic freedom.

### **4. The Final Scholarly Offer**

The Journal remains open to correcting the record if objective errors are identified. We hereby call upon your clients to:

Identify the specific sentences they claim are factually unsupported.

Submit a formal Letter to the Editor for peer review.

### **5. Interim Status**

The Publisher has placed the article under a Formal Internal Review which will conclude within 15 business days. Any attempt to initiate litigation during this active inquiry will be met with a claim for damages for malicious interference with editorial independence.

Yours faithfully,

**Advocate Raghvendra Pratap Singh,**  
Legal Advisor, (Contact Info: +91- 83185-49332)  
**For M/s Stallion Publication**

Regards

**Editorial & Technical Team**  
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On Thu, Apr 16, 2026 at 10:27 AM mini nair <[mininair.adv@gmail.com](mailto:mininair.adv@gmail.com)> wrote:

To,

The Legal Advisor,

For M/s Stallion Publication

**Ref:** 1. My Legal Notice dated 03.04.2026. 2. Your Reply/Communication dated 07.04.2026.

**Madam/Sir,**

Under instructions from and on behalf of my clients, **Mr. Hendrix** and **Dr. William Bernet** (Parental Alienation Study Group - PASG), I address you as under:

1. I am in receipt of your reply dated 07.04.2026, the contents of which were placed before my clients for their consideration.
2. My clients state that the contentions raised in your reply are legally untenable, factually incorrect, and appear to be an attempt to evade the responsibility of maintaining academic and scientific integrity.
3. Attached herewith, please find the **Rejoinder** to your said reply. This document systematically addresses the fallacies in your defense regarding "academic freedom" and "narrative review," and reiterates the objective presence of fraudulent data within the published article.
4. You are hereby called upon to comply with the demands set out in the original Legal Notice and this Rejoinder within **2** days of receipt of this communication, failing which my clients have given me clear instructions to initiate appropriate legal proceedings in the competent courts and before the regulatory authorities, including the **UGC Standing Committee on Academic Integrity**, at your sole cost and risk.

**Yours faithfully,**

**MINI M. NAIR**

Advocate