

*Mini M. Nair*

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**Speed Post/Email**

03.04.2026

To,

1. Dr. Jyoti Doley,  
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Integrated Journal for Research  
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**Subject: Legal notice for the immediate and permanent retraction of the article titled “The scientific case against parental alienation: a critical review” (authored by Keith Robert Head, published in Vol. 6, Issue 1, January 2026).**

Madam/Sir,

Under instructions from my clients, Mr. Phillip Hendrix, M.A., MBA, President and Mr. William Bernet, M.D., Past President of the Parental Alienation Study Group (for short “PASG”), having

address at P.O. Box 4090, Brentwood, Tennessee, USA, I hereby serve you with this Notice of Demand for Retraction and Cease and Desist as under:

1. That my clients are the representatives of PASG, an international nonprofit organization comprising over 1,400 members from 60 countries, including world-renowned scholars, researchers, clinicians and policy makers dedicated to the study of Parental Alienation and its negative consequences for children and their rejected parents.
2. That your journal, "*Integrated Journal for Research in Arts and Humanities*", published an article in January 2026 by one Mr. Keith Robert Head titled "*The Scientific Case Against Parental Alienation: A Critical Review*". My clients state that this article represents the absolute nadir of academic scholarship, as it is a biased polemic replete with dozens of false statements, blatant misinformation, and distortions of fact.
3. That the article in question is scientifically fraudulent, biased polemic rather than an objective review, on the following grounds:

(i) **Gross Selection Bias and Lack of Rigor:**

The article relies on non-peer-reviewed and subjective sources rather than scientific data. The selection bias is overwhelmingly obvious, in that the article cites at least 16 articles by authors who have consistently criticized Parental Alienation Theory, including Bruch (2001), Houchin et al. (2012), Johnston (2003), Johnston and Kelly (2004), Katz (2015), Kelly and Johnston (2001), Lapierre et al. (2016), Meier (2009, 2019, 2020), Mercer (2022), Milchman (2019), Mooney (2024), Rowen and Emery (2014), Silberg and Dallam (2019) and Willis and O'Donohue (2018). The article lack of scientific rigor is reflected by its citing non-peer-reviewed documents, including Alsalem (2023), Dreyfus (2023), and NCJFCJ (2021)

**Scientific Rebuttal:** In contrast, the article cites exactly one article by a proponent of parental alienation theory,

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i.e., Rueda (2004). In the Parental Alienation Literature, there are more than 1,000 peer-reviewed journal articles and scholarly book chapters. For example, the two articles (i) 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 and (ii) Marsden, J. (2025). The scientific rigor of parental alienation studies: A quality assessment of the peer-reviewed research “Partner Abuse” available online prior to publication, are excellent examples of the status of the scientific literature regarding Parental Alienation.

(ii) **Ad Hominem Attacks against Mr. Richard Gardner:**

The article attacks Mr. Richard Gardner and some of that content constitutes misleading statements, such as (1) “Gardner formulated PAS based on his subjective, anecdotal clinical observations from his practice rather than peer-reviewed scientific studies” (Pg.64), (2) “Gardner avoided peer-review while creating an appearance of legitimate third-party validation”(Pg.64), (3) “No controlled studies have supported the theory, and Gardner’s claims have not been independently replicated” (Pg.65), (4) “The body of empirical research that does exist appears to contradict rather than support the concept’s core claims”(Pg.65)

**Scientific Rebuttal:** The above referred statements are false, which is clear from the following:

- (a) It is normal and typical for a new medical or psychological condition to be identified and described based on a practitioner’s personal clinical observations. For example, George Huntington described “hereditary chorea” (Huntington’s disease) in 1872, Leo Kanner described “infantile autism” in 1943, Gilles de la Tourette published an account of nine patients with Tourette Syndrome in 1885. Gardner should be complimented rather than criticised for identifying and

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describing a novel psychological condition in the context of his own practice as a child psychiatrist.

- (b) It is blatant misinformation to say that Gardner did not publish in peer-reviewed journals. My clients' records indicate that Gardner published at least 18 articles regarding Parental Alienation in peer-reviewed journals in 1989 (two articles), 1991, 1998 (two articles), 1999 (three articles), 2001, 2002 (four articles), 2003 (two articles), 2004 (three articles). For details, see the extensive bibliography in Bernet, W. (2010), Parental Alienation, DSM-5, and ICD-11.
- (c) As stated above, there are more than 1,000 peer-reviewed journal and scholarly book chapters regarding parental alienation. See the review articles by Harman et al. (2022) and by Marsden (2025) and the extensive bibliography in Bernet, W. (2010)

(iii) **Misinformation Regarding Parental Alienation and Estrangement**

The author falsely claims; (1) "*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*"(Pg.65), (2) "*Researchers alleging parental alienation behaviors acknowledge that no reliable instruments exist to differentiate parental alienation from justified estrangement in cases where children have been victimized by abuse or family violence and appropriately fear or reject the offending parent (Saini et al., 2016)*" (Pg.66)

**Scientific Rebuttal:** The above referred statements are false, which is clear from the following:

- (a) For at least 20 years, proponents of Parental Alienation Theory have stated clearly that there are multiple causes of contact refusal or parent-child contact problem, which must be considered when a child

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refuses to have a relationship with a parent. For example, see: Freeman, B. W. (2020). The psychosocial assessment of contact refusal. In D. Lorandos and W. Bernet, *Parental Alienation Science and Law* (pp. 44-81).

(b) First, the author is misrepresenting the opinion of Saini et al. (2016). In that same book chapter, Saini et al. famously said: "There is remarkable agreement about the behavioral strategies parents can use to potentially manipulate their children's feelings, attitudes and beliefs in ways that may interfere with their relationship with the other parent. The cluster of symptoms or behaviors indicating the presence of alienation in the child can also be reliably identified" See: Saini, M., Johnston, J. R., Fidler, B. J., and Bala, N. (2016). In L. Drozd, M. Saini, and N. Olesen (Eds.), *Parenting Plan Evaluations: Applied Research for the Family Court* (2nd ed., p. 423).

(c) Furthermore, the Five-Factor Model for the diagnosis of parental alienation is a generally accepted and reliable way to distinguish alienation from estrangement. The five factors are (i) the child manifests contact resistance or refusal (ii) a prior positive relationship between the child and the rejected parent (iii) absence of abuse, neglect, or seriously deficient parenting by the rejected parent (iv) alienating behaviors manifested by the favored parent and (v) behavioral manifestations of alienation in the child. See: Bernet W., and Greenhill, L. L. (2022). The Five-Factor Model for the diagnosis of parental alienation. *Journal of the American Academy of Child and Adolescent Psychiatry*, 61(5): 591- 594.

(iv) **Gender and Ideological Biases**

The author claims that parental alienation is a tool used by abusive men to gain custody of their children. He relies on two prominent publications for that argument: (1) The Family Court Outcomes Study, reported by Meier (2020). (2) The non-peer-reviewed report of the Special Rapporteur

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to the Human Rights Council of the United Nations (Alsalem, 2023).

**Scientific Rebuttal:** The author relied on two documents that have been thoroughly critiqued and refuted by Parental Alienation Scholars. The Meier (2020) article was reviewed and criticized by: Harman, J. J., Lorandos, D. (2021). Allegations of family violence in court: How parental alienation affects judicial outcomes. *Psychology, Public Policy, and Law*, 27(2), 184-208. Another pertinent article is: Harman, J. J., Kruk, E., & Hines, D. A. (2018). Parental alienating behaviors: An unacknowledged form of family violence. *Psychological Bulletin* 144(12), 1275-1299.

The Alsalem (2023) report is an extremely biased and unscientific document. The report was reviewed and criticized by members of the Parental Alienation Study Group and Global Action for Research Integrity in Parental Alienation, and the review was published as *An Analysis of the Report by the Special Rapporteur on Violence Against Women and Girls, Its Causes and Consequences to the United Nations Human Rights Council*. The analysis by PASG and GARI-PA can be found at: <https://www.wirvaeter.at/wp-content/uploads/2023/06/20230602-Analysis-Report-Special-Rapporteur.pdf>

(v) **Argument from Ignorance**

In another example of blatant misinformation, the author says; “*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*” (Pg. 65). Specifically, the author cites out-of-date documents that is, American Psychological Association (1996) and National Council of Juvenile and Family Court Judges (2021) that misrepresent the current position of those organizations.

**Scientific Rebuttal:** In the United States, parental alienation has been accepted in legal circles in every state. Also, the concept of parental alienation has been recognized by the American Academy of Child and Adolescent

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Psychiatry (1997), the American Academy of Matrimonial Lawyers (2015), the American Academy of Paediatrics (2016/2022), the American Psychological Association (2022), the Association of Family and Conciliation Courts (2019, 2022), and the National Council of Juvenile and Family Court Judge (2022). For more information and detailed references, see: Parental Alienation Study Group (2025), the recognition of parental alienation by professional organizations. In *Parental Alienation Theory: Official Synopsis* (pp. 101 108). The PDF of this book is available for free on the homepage of [www.pasg.info](http://www.pasg.info).

(vi) **Misinformation Regarding the Diagnostic and Statistical Manual of Mental Disorders (DSM-5-TR).**

The statement of Mr. Head that “*The American Psychiatric Association has consistently declined to include PAS in any edition of the Diagnostic and Statistical Manual of Mental Disorders due to insufficient empirical evidence supporting it as a distinct mental disorder*” (Pg.65) is highly misleading.

**Scientific Rebuttal:** The DSM distinguishes “mental disorders” (which occur within the minds of affected individuals) and “mental conditions” (which occur between individuals, such as relational problems). The leadership of the DSM have consistently said that parental alienation should be considered a mental condition, since it involves an interaction among three family members. In fact, the definitions of the following DSM relational problems include the concept of parental alienation, child affected by parental relationship distress, parent child relational problem, and child psychological abuse. For a more complete discussion, see Parental Alienation Study Group (2025), Parental alienation, DSM, and ICD. In *Parental Alienation Theory: Official Synopsis* (pp.125 131). The PDF of this book is available for free on the homepage of [www.pasg.info](http://www.pasg.info).

4. That it is pertinent to mention at this stage that I have only pointed out the major deficiencies of the Head article. My clients can provide a more detailed commentary, if necessary. However, the above referred flaws explained are more than enough reason for you to promptly retract this article from publication. Further this article satisfies the criteria for retraction promulgated by the Committee on Publication Ethics (COPE) due to "extensive misinformation," "scientific fraud," and "distortions of fact" that compromise the journal's integrity.
5. That my clients and their colleagues have made every reasonable effort to resolve this through academic channels only to be met with total silence:
  - (i) Mr. Head was contacted directly by my clients' representative Mr. Rabbi Yaakov Aichenbaum on 18.01.2026 and 19.01.2026 and pointed out that his article is unacceptable as it is lacking credible academic support. However, Mr. Head simply responded that he conducted a "narrative review", which apparently allowed him to select and cite whichever resources he preferred, as long as they supported his predetermined, biased opinion on this topic. That even a "narrative review" must adhere to academic standards and does not grant a license for extreme selection bias or the deliberate exclusion of over 1,000 peer-reviewed articles that contradict his biased opinion.
  - (ii) My clients sent you a detailed critique via email on two separate occasions; you failed to respond.
  - (iii) Dr. Bernet telephoned Stallion Publication six times during regular business hours, no one answered.
  - (iv) Since none of these initial efforts were successful, Dr. Bernet contacted the administration of Capella University, Minneapolis, Minnesota, USA, where Mr. Head is pursuing a Ph.D. in social work. Dr. Bernet requested that University personnel to encourage Mr. Head to retract this article in

your journal. The Capella University has already initiated an investigation into his scholarly activities through their Office of Research Compliance.

6. That your total silence and failure to address these grave scientific errors demonstrate bad faith and professional negligence. That safety of children and the integrity of scientific scholarship must be prioritized over the continued dissemination of this discredited work.
7. That please take note that this demand for immediate retraction is not merely the position of my clients but is supported by a global consensus of esteemed international scholars, researchers, and clinicians who have collectively reviewed the article and found it to be scientifically unacceptable. This distinguished roster of experts includes Mr. Rabbi Yaakov Aichenbaum, Dr. Alan Blotcky, Ph.D., Dr. Michael Bone, Ph.D., Dr. Jennifer Harman, Ph.D., Dr. Brian Hart, Ph.D., Dr. Ben Hine, Ph.D., Dr. Stan Korosi, Ph.D., Dr. Jesper Lohse, Ph.D., and Dr. Joshua Marsden, Ph.D.
8. That the article is already being weaponized on social media to spread false claims that Parental Alienation is unscientific, which directly damages thousands of children and families by influencing custody determinations in ways that compromise child safety by placing them in potentially abusive environments. It further causes ongoing damage to the professional reputations of my clients and the mission of PASG.
9. The continued hosting of this scientifically fraudulent and defamatory content, despite formal notice given by my clients, constitutes a violation of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021. Further the publication of these false statements, with the knowledge that they are harmful to my clients' reputations, attracts the provisions of Section 356 of the Bharatiya Nyaya Sanhita, 2023, and Civil Libel, for which you are jointly and severally liable.
10. That the Editor-in-Chief is an Associate Professor at an Indian Institute (Haldia Institute of Technology), is also governed by University Grants Commission (UGC) regulations regarding academic integrity. The publication of "predatory" or "unverified" research violates the UGC (Promotion of Academic

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Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations. Your failure to maintain academic standards constitutes a categorical violation of the mandates set by the University Grants Commission (UGC) Consortium for Academic and Research Ethics (UGC-CARE). Any continued failure to retract this article will be formally reported to the UGC-CARE Cell, which may lead to the permanent removal of your journal from the UGC-CARE Reference List of Quality Journals.

11. That the publisher, M/s Stallion Publication, as the overarching entity responsible for the *Integrated Journal for Research in Arts and Humanities*, owes a fundamental duty of care to the global academic community, licensed professionals, and the general public to ensure that the content it disseminates is scientifically accurate and ethically sound. By holding itself out as a "Double-Blind Peer-Reviewed" journal, the publisher represents a guarantee of rigorous editorial oversight and factual integrity. However, the publication of the article in question characterized by extreme selection bias, documented misinformation, and the omission of over 1,000 peer-reviewed sources constitutes a gross failure of this duty. Such professional negligence in the vetting process not only compromises the journal's credibility but also facilitates the "weaponization" of fraudulent data in sensitive legal and clinical environments. Under the principles of strict liability for published content and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, the publisher is legally and ethically bound to exercise immediate corrective oversight by retracting the article to prevent further systemic harm and reputational damage to my clients.
12. I, therefore, through this Legal Notice, call upon you to:
  - (1) Immediately retract the aforementioned article from the *Integrated Journal for Research in Arts and Humanities*.
  - (2) Permanently remove the article and all digital links to it from your website and associated repositories.
  - (3) Publish a formal Corrigendum/Retraction Note on the homepage of the Journal and the Publication's website,

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acknowledging the factual errors and withdrawing the article in toto.

13. Please note that if you fail to comply with these demands and do not provide a written confirmation of the retraction within seven (7) days of receipt of this notice, my clients have given me firm instructions to initiate legal proceedings in the Courts of India to seek a mandatory injunction and monetary damages for the harm caused. Take further notice that you shall be held liable for all legal costs and consequences arising therefrom.

Yours faithfully,



Mini M. Nair

Advocate

*Enrolment No. G/1909/2000*