

16.04.2026

To,
Legal Advisor for M/s Stallion Publication
Editorial & Technical Team
Integrated Journal for Research in Arts and Humanities
editor@ijrah.com, mail2ijrah@gmail.com

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).

Re: Your reply dated 07.04.2026 to my legal notice dated 03.04.2026

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 rejoinder reply to your reply dated 07.04.2026 to our legal notice dated 03.04.2026 as under:

1. I appreciate your prompt response and the various proposals offered to address my clients’ concerns regarding the article authored by Mr. Keith Robert Head, including the suggestion of a formal scientific rebuttal or letter to the Editor of the *Integrated Journal for Research in Arts and Humanities*. You also mentioned the possibility of a series of corrigenda to correct the factual errors in Mr. Head’s article. Although my clients will consider those options, my clients continue to hold that the most appropriate approach is the retraction of the original article, for the reasons stated below:

1) Mr. Head’s article constitutes scientific fraud. In your reply to notice, you say that Mr. Head’s article is a “*critical review*,” which “*evaluates a theory from a specific skeptical or analytical lens*.” However, you are mistaken to say that

a **critical review** is a ^{Advocate} skeptical approach that focuses on criticisms of a theory or body of knowledge. The actual definition of a critical review is a formal evaluation of a scientific study that goes beyond just summarizing what the researchers did, but involves analyzing the strengths, weaknesses, and overall validity of the research.

Mr. Head did not analyze the strengths, weaknesses, and overall validity of parental alienation research, but he simply summarized the opinions of 16 critics of parental alienation theory and also cited several non-peer-reviewed documents. In contrast, he cited only one article by a proponent of parental alienation theory. It is easy to find hundreds of peer-reviewed articles regarding parental alienation. For instance, in the legal notice, my clients recommended two elaborate literature reviews regarding parental alienation theory. (1) Harman, Warshak, Lorandos, and Florian (2022) identified 213 peer-reviewed articles with empirical research regarding parental alienation. (2) Marsden (2025) examined the quality of the research methodology of 156 peer-reviewed publications regarding parental alienation. My clients can send you the actual review articles if you are not able to access them.

Although Mr. Head claimed that he searched various databases for “*peer-reviewed empirical studies*,” he ended up publishing an extremely biased critique of parental alienation theory. It is indeed a clear-cut example of “scientific fraud” for him to conclude, “*Decades of empirical evidence show that parental alienation ... remains substantially unsupported by rigorous research and continues to be rejected by major professional medical and psychological organizations*” (page 67).

- 2) **It appears unlikely that Mr. Head’s article in IJRAH was peer-reviewed.** In your reply to notice, you said, “*The Integrated Journal for Research in Arts and Humanities (INRAH) adheres to rigorous double-blind peer-review standards*”. That seems unlikely given the published timeline as the article was submitted to the IJRAH on 27.12.2025 and it was accepted seven days later on 03.01.2026.

A legitimate "double-blind peer-review," in such a timeline is practically impossible and points to a "predatory publication practice". A genuine peer-review process requires sufficient time for an editor to screen the manuscript, identify and secure at least two independent subject-matter experts, allow those experts to conduct a thorough analysis, and then facilitate a response and potential revisions from the author. Completing these complex steps within a single week, particularly during a major international holiday period is procedurally non-credible and suggests that no substantive critical evaluation took place.

It is further noted that the period between 27.12.2025 and 03.01.2026 coincides with major international year-end holidays, during which global academic experts and subject-matter reviewers are typically unavailable, further proving that the 'double-blind' process was a mere administrative fiction.

This administrative failure carries the following serious implications:

- (i) **Violation of UGC-CARE Standards:** As the Editor-in-Chief is an Associate Professor at an Indian Institute, she is governed by the University Grants Commission (UGC) regulations regarding academic integrity. The failure to maintain rigorous standards constitutes a categorical violation of the mandates set by the UGC Consortium for Academic and Research Ethics (UGC-CARE).
- (ii) **Evidence of Procedural Negligence:** This abbreviated timeline explains how an article replete with dozens of false statements and "data fabrication" was able to bypass editorial oversight. Had a qualified expert in developmental psychology reviewed the work, the gross selection bias citing 16 critics while ignoring over 1,000 peer-reviewed sources would have been immediately identified as a breach of scholarship.

Given these irregularities, ^{Advocate} my clients demand that you provide the anonymized reviewer comments and editorial analysis to prove that any review actually occurred. Failure to provide such evidence confirms that the journal has prioritized rapid publication over factual and ethical integrity.

- 3) **It is the publisher's responsibility to correct blatant misinformation.** In your reply to notice, you rely on the principle of "*academic freedom*" and you say that means the publisher cannot retract an article without the author's permission. You say that retraction requires "*proven plagiarism or data fabrication.*" In fact, there are numerous assertions in Mr. Head's article that are blatantly false and amount to "*data fabrication.*" My clients have pointed out the false statements (details below), which are not simply differences in opinion among professionals, but are outright factual errors.

Your reliance on the principle of "*academic freedom*" to shield the article from retraction is legally and ethically flawed. While academic freedom protects diverse scholarly interpretations, it is not a license for academic fraud or the dissemination of blatant misinformation.

The Limit of "*academic freedom*" under Indian Law, i.e. the right to freedom of speech and expression under Article 19(1)(a) of the Constitution of India is subject to reasonable restrictions and does not extend to the publication of "predatory" or "unverified" research that violates academic integrity. The UGC Regulations on Academic Integrity specifically mandate that internal institutional standards must prevent the publication of fraudulent data. Therefore, you cannot hide behind "*academic freedom*" to justify hosting a work that fundamentally misleads the global scientific community.

You assert that retraction is reserved for "*proven plagiarism or data fabrication*". My clients contend that the methodology employed by Mr. Head constitutes a sophisticated form of empirical data fabrication as Mr. Head claims to have conducted a "literature review" and

"comprehensive search" ^{of major} of major databases like PubMed and PsycINFO. Despite this, he concluded that parental alienation is "unsupported by research" and that there is a "lack of data". In reality, there are more than 1,000 journal articles and scholarly book chapters on parental alienation, including at least 213 articles containing empirical research.

The systematic exclusion of this vast body of evidence to falsely represent the state of the science is not a "difference in scholarly interpretation", it is the deliberate fabrication of a "lack of evidence" to support a biased conclusion. This "scholarly echo chamber" methodology repeatedly citing 16 critics while ignoring over 1,000 contradictory sources is a clear-cut example of scientific fraud.

The author's defence that he conducted a "narrative review" does not grant him permission to select and cite only resources that support a predetermined, biased opinion. Even a narrative review must adhere to academic standards and does not provide a license for extreme selection bias or the purposeful omission of thousands of relevant peer-reviewed works. By maintaining the publication of this article, you failed your duty of care to ensure that disseminated content is scientifically accurate and ethically sound. Retraction is the only appropriate remedy for a work that has bypassed legitimate peer-review to present a fraudulent "critical review"

- 4) **Mr. Head's article makes false statements regarding Richard Gardner's publications in peer-reviewed journals.** It is an error for Mr. Head to say, "Gardner avoided peer-review while creating an appearance of third-party validation" (page 64). The following 18 peer-reviewed journal articles by Richard Gardner relate to parental alienation theory. The entire discussion of Gardner's publication history on page 64 of Mr. Head's article is flawed.

2004

- (1) Commentary on Kelly ^{Advocate} and Johnston's The alienated child: A reformulation of parental alienation syndrome. *Family Court Review*, 42(4): 611-621.
- (2) The three levels of parental alienation syndrome alienators: Differential diagnosis and management. *American Journal of Forensic Psychiatry*, 25(3): 41-76. 2004.

2003

- (3) Does DSM-IV have equivalents for the parental alienation syndrome (PAS) diagnosis? *American Journal of Family Therapy*, 31(1): 1-21. 2003.
- (4) The judiciary's role in the etiology, symptom development, and treatment of the parental alienation syndrome (PAS). *American Journal of Forensic Psychology*, 21(1): 39-64.

2002

- (5) The empowerment of children in the development of parental alienation syndrome. *American Journal of Forensic Psychology*, 20(2): 5-29.
- (6) Denial of the parental alienation syndrome also harms women. *American Journal of Family Therapy*, 30(3): 191-202.
- (7) Misinformation versus facts about the contributions of Richard A. Gardner, M.D. *American Journal of Family Therapy*, 30(5): 395-416.
- (8) Parental Alienation Syndrome vs. parental alienation: Which diagnosis should evaluators use in child-custody disputes? *American Journal of Family Therapy*, 30(2): 93-115.

2001

- (9) Should courts order PAS children to visit/reside with the alienated parent? A follow-up study. *American Journal of Forensic Psychology*, 19(3): 61-106.

1999

- (10) Family therapy of ^{Advocate} the moderate type of parental alienation syndrome. *American Journal of Family Therapy*, 27(3): 195-212.
- (11) Differentiating between parental alienation syndrome and bona fide abuse-neglect. *American Journal of Family Therapy*, 27(2): 97-107.
- (12) Guidelines for assessing parental preference in child-custody disputes. *Journal of Divorce & Remarriage*, 30(1): 1-9. 1999.

1998

- (13) Letter to the editor. *Child Maltreatment*, 3(4): 309-312.
- (14) Recommendations for dealing with parents who induce a parental alienation syndrome in their children. *Journal of Divorce & Remarriage*, 28(3-4): 1-21.
- (15) The Burgess decision and the Wallerstein brief. *Journal of the American Academy of Psychiatry and the Law*, 26(3): 425-31.

1991

- (16) Legal and psychotherapeutic approaches to the three types of parental alienation syndrome families: When psychiatry and law join forces. *Court Review of American Judges Association*, 28(1): 14-21.

1989

- (17) Differentiating between bona fide and fabricated allegations of sexual abuse of children. *Journal of the American Academy of Matrimonial Lawyers*, 5: 1-25.

1987

- (18) Judges interviewing children in custody/visitation litigation. *New Jersey Family Lawyer*, 7(2): 26-30, 43.
- 5) **Mr. Head's article makes false statements regarding the reasons for a child's contact refusal.** That is, the author falsely claims, "While PAS provides a possible

explanation for a ^{Advocate} breach in relationship between a child and a parent, it ignores evidence that children may have valid reasons for rejecting a parent" (page 65). The following five citations from proponents of parental alienation theory explicitly address the differential diagnosis of contact refusal or parent-child contact problem. (There are numerous additional citations my clients can provide regarding this issue.) The entire discussion of this topic at the top of page 65 of Mr. Head's article is flawed. Some of the citations as under for your reference:

- (1) Bernet (2006) listed the following factors that might cause a child to resist or refuse visitation: maltreated child, purposeful indoctrination, accidental indoctrination, parental alienation syndrome (PAS), worried child, stubborn child, and child escaping conflict. See: Bernet, W. (2006). Sexual abuse allegations in the context of child custody disputes. In R. A. Gardner, S. R. Sauber, & D. Lorandos (Eds.), *The International Handbook of Parental Alienation Syndrome: Conceptual, Clinical and Legal Considerations* (pp. 242-263).
- (2) Bernet et al. (2010) listed specific conditions and diagnoses that should be considered in the differential diagnosis of contact refusal: loyalty conflicts, physical abuse of child, sexual abuse of child, shared psychotic disorder, separation anxiety disorder, specific phobia, oppositional defiant disorder, adjustment disorder, parent-child relational problem, and parental alienation disorder. See: Bernet, W., Boch-Galhau, W. v., Baker, A. J. L., & Morrison, S. L. (2010). Parental alienation, DSM-V, and ICD-11. *American Journal of Family Therapy*, 38(2), 76-187.
- (3) Bernet and Freeman (2013) published a decision tree with the various reasons for a child's contact refusal: child's normal preference, loyalty conflict, child avoiding conflict, worried child, stubborn child, abused child, shared delusional disorder, and parental alienation. See: Bernet, W., & Freeman, B.

- W. (2013). The ^{Advocate} psychosocial assessment of contact refusal. In D. Lorandos, W. Bernet, & S. R. Sauber, *Parental Alienation: The Handbook for Mental Health and Legal Professionals* (pp. 47-73).
- (4) Freeman (2020) published the same decision tree several years later. See: Freeman, B. W. (2020). The psychosocial assessment of contact refusal. In D. Lorandos & W. Bernet, *Parental Alienation – Science and Law* (pp. 44-81).
- (5) Bernet, W., & Greenhill, L. L. (2022) said: “There are several causes of contact refusal, and it is necessary to conduct an evaluation to determine whether the cause in a particular case is PA or some other issue within the child or the family. Other causes of contact refusal include an understandable preference the child might have for one parent over the other; avoiding a loyalty conflict by gravitating to one parent and shunning the other; being worried or depressed, such as experiencing separation anxiety; being overly stubborn or oppositional; and estrangement due to previous maltreatment.” See: Bernet, W., & 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.
- 6) **Mr. Head’s article makes false statements regarding the acceptance of parental alienation theory by professional organizations in the U.S.** He said: “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” (page 65). This is blatant misinformation, which Mr. Head has simply copied from articles previously published by other critics of parental alienation theory. The following citations in chronological order are from a few of the professional organizations that have recognized the reality and importance of parental alienation. The name of each organization is followed by the citation for an official document published by that

organization. The entire ^{discussion} discussion of this topic on page 65 of Mr. Head's article is flawed. Details of the citations as under:

- (1) American Academy of Child and Adolescent Psychiatry published an Official Action, which has a heading with the title, "Parental Alienation." See: American Academy of Child and Adolescent Psychiatry (1997). Practice parameters for child custody evaluation. *Journal of the American Academy of Child & Adolescent Psychiatry*, 36(10 Supplement), 57S-68S.
- (2) American Academy of Matrimonial Lawyers published *Guidelines*, which describes the phenomenon of parental alienation and lists a number of alienating behaviors that are observed in these cases. See: American Academy of Matrimonial Lawyers (2015). *Child-centered residential guidelines*.
- (3) American Academy of Pediatrics published a report that recognizes parental alienation as a contributing factor to the difficulties faced by children of divorce. See: Cohen, G. J., Weitzman, C. C., & Committee on Psychosocial Aspects of Child and Family Health, & Section on Developmental and Behavioral Pediatrics (2016). Helping children and families deal with divorce and separation. *Pediatrics*, 138(6), e20163020.
- (4) American Psychological Association published a set of *Guidelines*, which have multiple references to parental alienation and alienating behaviors. See: American Psychological Association (2022). *Guidelines for child custody evaluations in family law proceedings*.
- (5) Association of Family and Conciliation Courts has published multiple documents that discuss parental alienation theory and related topics. For example, see: Association of Family and Conciliation Courts (2019). *Guidelines for parenting coordination*. Also, see: Association of Family and Conciliation Courts (2022).

Guidelines for parenting plan evaluations in family law cases.

- (6) Association of Family and Conciliation Courts & National Council of Juvenile and Family Court Judges collaborated in publishing a document regarding parent-child contact problems, which explicitly discusses parental alienating behaviors. See: AFCC and NCJFCJ (2022). *Joint statement on parent-child contact problems.*

7) Mr. Head's article contains additional false statements.

In addition to the false information discussed above, my clients have identified the following additional misinformation in Mr. Head's problematic article. These false and misleading statements can be explained in greater detail if you would find that helpful:

- (i) "The prevailing consensus among experts is that PAS and its subsequent iterations lack evidential support" (page 64).
- (ii) "No controlled studies have supported the theory, and Gardner's claims have not been independently replicated" (page 65).
- (iii) "However, the failure to distinguish between alienation and justified estrangement represents a fundamental problem in both research and practice" (pages 65-66).
- (iv) "This is not an isolated case, it's estimated that 58,000 children annually are placed in dangerous homes due to PA-influenced custody outcomes (Meier, 2020)" (page 66).
- (v) "When courts credit alienation claims in custody cases, children are frequently ordered into reunification programs that produce harmful outcomes" (page 66).

(vi) "Research examining ^{advocate} PA treatments echoes this, finding advocates have 'failed to provide empirical support for the safety and effectiveness of their methods'" (page 67).

8) It is obvious that Mr. Head's article is riddled with misinformation, false and misleading statements, and extremely biased methods and conclusions. Mr. Head himself acknowledged the fundamental problem with his methodology: "This review has several limitations worth noting. ... The inclusion criteria prioritized sources that critically engaged with questions of validity rather than purely anecdotal presentations, which could introduce a bias toward PA-skeptical literature" (page 67).

2. Although my clients have no way of knowing precisely what Mr. Head was thinking and planning, it appears that he started with a clear preconceived bias against parental alienation theory. He then searched various databases for journal articles consistent with his bias, and he easily found a collection of parental alienation critics (e.g., Bruch, Meier, Mercer, etc.), who have been publishing negative reviews of parental alienation theory for years. Mr. Head simply recycled the same critiques that had already been stated and restated in journal articles and book chapters. This methodology referred to as a scholarly echo chamber results in the repetition of the same misinformation derived from secondary and even tertiary sources. When taken to this extreme, it is not simply sloppy writing or multiple editing errors, but obvious scientific fraud. The editors and publishers of the *Integrated Journal for Research in Arts and Humanities* can correct this blunder quickly by retracting "The Scientific Case Against Parental Alienation: A Critical Review."
3. As a publisher, the paramount legal principle of the "Interests of the Child" and the overarching requirement for public safety must take precedence over any perceived contractual or moral rights of the author. You, as the entity responsible for the *Integrated Journal for Research in Arts and Humanities*, owe 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. This duty is ^{Advocate} breached when a work containing "extensive misinformation" is allowed to remain in the scientific record. The continued hosting of this article facilitates the "weaponization" of fraudulent data in highly sensitive legal and clinical environments. Evidence shows the article is already being utilized on social media to spread false claims that parental alienation is unscientific and lacks controlled research. This dissemination is not a harmless academic exercise, it is directly influencing custody determinations by providing a pseudo-scientific basis for critics to undermine the reality of parental alienation. Such influence compromises child safety by potentially placing children in abusive environments and subjecting them to harmful outcomes where their protective responses are misinterpreted. Consequently, the safety of children and the integrity of scientific scholarship must be prioritized over the dissemination of this discredited work, and the publisher is legally and ethically bound to exercise immediate corrective oversight by retracting the article.

4. Kindly note that Dr. Jyoti Doley, in her capacity as the Editor-in-Chief of the *Integrated Journal for Research in Arts and Humanities (IJRAH)* and as an Associate Professor at the Haldia Institute of Technology in West Bengal, is professionally and legally bound by the University Grants Commission (UGC) regulations regarding academic integrity. The continued publication of the article by Keith Robert Head constitutes a categorical violation of the UGC (Promotion of Academic Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations. These regulations mandate that academic professionals and the journals they lead must prevent the dissemination of "predatory," "unverified," or "fraudulent" research. The Head article, characterized by "scientific fraud" and "extensive misinformation," fails to meet these essential ethical thresholds.

The UGC Consortium for Academic and Research Ethics (UGC-CARE) requires journals to maintain rigorous editorial oversight and factual integrity to remain on its Reference List of Quality Journals. The journal's claim of adhering to "rigorous double-blind peer-review standards" is fundamentally undermined by the published timeline, where

the manuscript was submitted ^{advocate} on December 27 and accepted just seven days later on January 3. Such a timeline for a complex review article is procedurally non-credible and points to a failure in the vetting process.

It is a clear-cut example of scientific fraud for the author to conclude that parental alienation is "unsupported by research" while systematically excluding over 1,000 peer-reviewed sources and instead citing non-peer-reviewed documents. Facilitating the "weaponization" of such fraudulent data in sensitive legal environments constitutes a grave breach of the Editor's duty of care to the academic community. Failure to maintain these academic standards and address documented "distortions of fact" is a violation of the mandates set by UGC-CARE.

Any continued failure to retract this work will necessitate a formal petition to the UGC-CARE Cell to delist IJRAH from the Reference List of Quality Journals, alongside a formal complaint to the Internal Quality Assurance Cell (IQAC) of the Haldia Institute of Technology regarding the professional ethics of the Editor-in-Chief.

5. Kindly further note that you, as a publisher violated the provisions of Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021. You are the overarching entity responsible for the digital dissemination of the *Integrated Journal for Research in Arts and Humanities (IJRAH)*, is bound by the due diligence requirements mandated under the Information Technology Rules, 2021. You, function as a digital publisher of scholarly content and are legally and ethically obligated to exercise immediate corrective oversight when hosted content is proven to be fraudulent or defamatory.

You are having the knowledge and due diligence, following the legal notice served on 03.04.2026, providing you with specific "knowledge" regarding the "scientifically fraudulent and defamatory content" within the article by Mr. Keith Robert Head. Under the IT Rules, 2021, the continued hosting of such material after being formally put on notice constitutes a direct violation of due diligence requirements. Your total silence and

failure to address documented "distortions of fact" demonstrate professional negligence and bad faith.

Under the principles of strict liability for published content established in the IT Rules, 2021, you are joint and severally liable for the reputational damage caused to international experts, including Dr. William Bernet and Mr. Phillip Hendrix. Disseminating false statements with the knowledge that they are harmful to professional reputations attracts the provisions of Section 356 of the Bharatiya Nyaya Sanhita, 2023, and civil libel.

Under the Information Technology Rules, 2021, and the principle of 'Actual Knowledge' established by the Hon'ble Supreme Court of India, your failure to remove content proven to be fraudulent and defamatory, despite formal notice, strips you of any 'Safe Harbour' protection, rendering you directly liable for the content.


The article in question represents a sophisticated form of "data fabrication" through the systematic exclusion of over 1,000 peer-reviewed sources to falsely claim a "lack of research" exists. Such fraudulent methodology is not protected under Article 19(1)(a) of the Constitution of India, as academic freedom is not a license for academic fraud. The IT Rules, 2021, are designed to prevent the digital spread of misinformation that causes systemic harm, such as the current "weaponization" of this article to influence custody cases and place children in potentially abusive environments.

Thus, you, as a publisher are legally and ethically bound to prevent further systemic harm by retracting the article immediately and removing all digital links from its repositories. Any further delay in taking down this discredited work will be treated as a persistent breach of the Digital Media Ethics Code, for which the Publisher shall be held liable for all legal costs and consequences.

6. The continued hosting of this content facilitates systemic harm by influencing custody determinations, which compromises child safety by potentially placing children in abusive environments. By holding themselves out as a

"Double-Blind Peer-Reviewed ^{Advocate} journal while failing to conduct a vetting process that identifies blatant fraud, the Publisher and Editor have jointly breached their duty of care to the global academic community and the general public. The principle of joint and several liability ensures that both the Publisher and the Editor-in-Chief are responsible for the full extent of the harm caused to my clients and the families impacted by this misinformation. My clients reiterate their demand for the immediate retraction of the article within 2 days of the receipt of this rejoinder, to prevent further legal costs and the pursuit of monetary damages in the Courts of India.

Yours faithfully,


Mini M. Nair

Advocate

Enrolment No. G/1909/2000

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