

# 2024 Men and Families Conference

## **PARENTS' AND CHILDREN'S BEHAVIOURS: DISTINCTIONS BETWEEN PARENTAL ALIENATION AND JUSTIFIED REJECTION/RESISTANCE OR AMBIVALENCE**

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## WHAT IS PARENTAL ALIENATION – CONCEPTUAL CONSTRUCTS

- A. History of PA/PAS
- B. Jurisprudence - Memo ([Hyperlink](#)) – Key Quote from 2011 Manitoba case ([Hyperlink](#))
- C. It does not require expert evidence to establish the concept as the primary cause of the family dysfunction (see A.M. v. C.H., [2019 ONCA 764](#) (CanLII)) (Most provinces follow this – BC is an outlier – Williamson)
- D. While there is no one universal set of criteria, there are published guidance with scientific merit:
- E. The Five-Factor Model
- F. Clawar & Rivlin Children Held Hostage, 2<sup>nd</sup> Edition 2013 ABA
- G. Attachment Based Models – Dr. Craig Childress;
- H. DSM-5 categories such as V995.51 (child psychological abuse) or V62.820 (parent-child relational problem) or (V61.29) child-affected by parental relationship distress
- I. Coercive Control [See Resources [NYTimes article](#); [FCR Article](#) and S.V.G. v V.G, [2023 ONSC 3206](#)];
- J. Disproportionality/anchoring/cognitive distortions/unyielding positions resistant to contra-evidence and exhibited lack of empathy

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## **PRACTICAL CHARACTERISTICS OF PARENTAL ALIENATION**

**World Parents Organization (along with many Canadian cases) has identified key areas of focus**

- 1. The Child Manifests Contact Resistance or Refusal, ie, Avoids a Relationship With One of the Parents.**
- 2. The Presence of a Prior Positive Relationship Between the Child and the Rejected Parent.**
- 3. The Absence of Abuse, Neglect, or Seriously Deficient Parenting on the Part of the Rejected Parent.**
- 4. The Use of Multiple Alienating Behaviors on the Part of the Favored Parent.**
- 5. The Child Exhibits Many of the Eight Behavioral Manifestations of Alienation.**

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## INDICATIVE PARENTAL BEHAVIOURS - 1

The World Parents Organization (along with many Canadian cases) has highlighted 17 bad parental behaviours observed in instances of P.A.

1. **Bad-mouthing the rejected parent.**
2. **Limiting the child's contact with the rejected parent.**
3. **Interfering with the child's communications with the rejected parent.**
4. **Limiting mention of the rejected parent.**
5. **Withholding approval when the child shows an interest in the rejected parent.**
6. **Telling the child that the rejected parent does not love them.**
7. **Allowing the child to choose between their parents.**
8. **Creating the impression that the rejected parent is dangerous.**

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## INDICATIVE PARENTAL BEHAVIOURS - 2

9. Forcing the child to reject the alienated parent.
10. Confiding in the child about adult topics.
11. Asking the child to spy on the rejected parent.
12. Asking the child to keep secrets from the rejected parent.
13. Referring to the rejected parent by their first name.
14. Referring to a stepparent as “Mom” or “Dad”.
15. Withholding medical, social, or academic information from the rejected parent.
16. Changing the child’s name to remove association with the rejected parent.
17. Undermining the authority of the rejected parent.

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## Eight Behavioural Signs in the Child

**World Parents Organization** has summarized **eight** behavioral signs of the manifestation of parental alienation. These factors are from the perspective of the child's behaviours:

1. Campaign of denigration, whereby the child repeats their list of criticisms of the rejected parent to counselors, evaluators, attorneys, and, ultimately, the judge.
2. Weak, frivolous, and absurd rationalizations for the child's rejection of a parent.
3. Lack of ambivalence regarding both the favored parent and the rejected parent, ie, the child considers one parent all good and the other parent all bad.
4. The independent thinker phenomenon, whereby the child strongly professes that the decision to cut off the rejected parent is theirs alone.
5. Absence of guilt about their rude, hurtful treatment of the rejected parent.
6. Reflexive support for the favored parent in parental conflict.
7. Presence of borrowed scenarios, ie, making accusations about the rejected parent that use phrases and ideas adopted from the favored parent.
8. Rejection of the rejected parent's extended family.

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## Distinctions Between Alienation, Enmeshment/Boundary Dissolution & Other Dynamics

1. What is Enmeshment and why is it harmful? [See [Jurisprudence](#) & [Article Boundary Dissolution](#)]
2. What is Gatekeeping and why is that harmful? [See Y. v F.T., [2017 ONSC 4395](#) & [Article](#) ]
3. Can clinical anxiety become a reason for the breakdown in a parent-child relationship?
4. What about different parenting styles and the battle between an overly permissive home and a normal home with appropriate structured boundaries

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## What Does “Justified Rejection/Resistance” mean?

Is there a “false binary”?

1. Emotional/physical/psychological abuse to a level that would invoke child protection issues?
2. Is one or two or three incidents enough to create “cover” for the favoured parent, or does it have to be demonstrated that the rejected parent has an enduring pattern of abusive/non-normative behaviour, which never changes;
3. What is “normative” parental behaviour and can it be identified?
4. What if parenting deficiencies/style errors are remedied with parenting coaching and systemic family therapy - does the excuse/safe harbour go away?



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**What if a child is “ambivalent” about one parent, but strongly bonded with the other parents?**

- 1. Ambivalence can be a sign of an insecure or disorganized attachment with one parent - not healthy;**
- 2. The opposite of love is not hatred, it is disinterest or ambivalence, and this is therefore very concerning;**
- 3. Ambivalence about a parent means that the relationship is at risk of not surviving childhood**

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There are no perfect parents and favoured parents are quite often imperfect in terms of their support for the child's relationship with the other parent.

1. Observations of the late Justice Gomery in PSM case [[Montréal 1991](#) – upheld on appeal at J.-LC c. PSM, [1991 CanLII 2974](#) (QC CA),];
2. See article “[Remembering Justice Gomery](#)”; [See Handout 2]
3. See *Epshtein v. Verzberger-Epshtein* [2021 ONSC 7694](#).

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## **CONCLUSIONS COMMENTS AND QUESTIONS**

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