Family Court-Associated Filicides: Child Murders Preventable by Judicial Decisions

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Abstract

Alarmingly, filicides by parents have followed some court-ordered contacts of children with divorced parents whom the children feared and rejected. Parental suicides have, in some cases, followed the filicides. Courts have justified their orders for contact on the grounds of allegations of parental alienation, although previous child abuse and domestic violence are known probable predictors of tragic events. To prevent these murders and suicides, courts need to consider the lack of evidence for parental alienation and the abundance of evidence that earlier violence predicts poor outcomes after divorce. Three filicide narratives are presented as examples of court-associated murders of children by parents. Limitations of our present knowledge base are emphasized, and systematic investigation of family court-associated filicides is urged.

Keywords: *filicides, family courts, parental alienation, child abuse, domestic violence*

"I brought you into this world, I can take you out of it". This not-very-funny witticism represents a well-known view of the rights of parents, but a view on which few parents are inclined to act. When parents kill children, their acts may result from episodes of intense anger, frustration, and wishes for retribution (Kauppi et al., 2012), just as many other acts of child abuse do. Filicides may also occur as forms of revenge against a partner (Moen & Bezuidenhout, 2023; Myers et al, 2021; Ozcanli et al, 2024). Although previous child abuse and intimate partner violence (IPV) can be predictors of these murders (Vileisis & Laufer, 2025), they probably also involve a strong element of chance. But some child murders follow a predictable though little-known pattern in which judicial decisions may play a powerful role. We think it is appropriate to call such murders *family court-associated filicides.*

In this article, we will discuss child murders by parents—filicides—as they occur within specific family court scenarios that have only recently begun to be described (Spearman et al, 2025). These child deaths occur in the context of divorce or separation and involve both previous parental violence and children's resistance to contact with the violent and frightening parent. In many filicide cases, when children have tried to avoid one parent, courts have accepted the allegation that the preferred parent is "alienating" the children and persuading them to fear and avoid the other parent—a concept defined by Bernet (2022) and Freeman (2022) as well as others. Courts too often respond to the allegation of "parental alienation" by ordering children into contact with the parent they fear, and when this contact occurs, the feared parent, in some cases, murders the child and may also suicide.

Although child mortality statistics are kept, identification of complex filicide cases is difficult without careful analysis of the history of each case. The study of filicides is beginning with the descriptive, "natural history" approach common to the beginnings of all scientific investigations. In the case of filicides, the importance of these events is enshrined in the various state laws based on the model, Kayden's Law. Kayden's Law is Title XV of the VAWA Reauthorization Act of 2022, part of the reauthorization of the federal Violence Against Women Act, originally enacted in 1994 (Robideaux, 2022). The burden of the model Kayden's Law is to require consideration of domestic violence in making

decisions about court orders for child visitation with a parent, and to require that testimony about violence and abuse be based on experts' training and experience in that field. Each of the state laws based on the model law is named for a child who was murdered by a parent in the midst of family litigation, except that the Pennsylvania law is also called Kayden's Law. Utah's Om's Law was described as "a bill to better keep children away from abusive parents" (Higgins, 2024); it limited the use of reunification treatments that may force children into contact with parents who have been or are potentially abusive.

Several investigators are amassing records of filicide cases. The present authors know of over one hundred cases, but these are as yet incompletely documented and analyzed. A complete analysis would require access to transcripts of court proceedings, which would be prohibitively expensive and also require other resources such as time, legal representation, and the emotional energy of both victims and advocates.

On the basis of the information we have, we can say that it appears that fathers are by far the more likely parents to kill a child, but we have little information about the fathers' ages, mental or physical health, or other possibly relevant factors. We know even less about the murdered children's genders, ages, and abilities or disabilities, and thus cannot even hypothesize about their roles in the family conflict that escalated so tragically. The preferred parents in these cases are usually the mothers, but little more than that fact is known about that group, and almost nothing is known about surviving siblings who may or may not have been present at the child's death. We are thus left with no information beyond the narratives of individual cases, but this is an essential starting point that alerts us to the nature of family court-associated filicides, and the narratives will help us identify and study larger data samples in the foreseeable future.

Three Cases of Family Court-Associated Filicides

We will present three stories of filicide. We are well aware that these three cases—although they are taken from a larger sample—are not in themselves strong evidence that judicial decisions ordering children into contact with feared parents are responsible for child deaths. However, these narratives of real children should serve to alert *Advisor* readers to the possibility that courts can play a destructive rather than a protective role in the lives of children whose parents are in divorce or custody litigation. This destructive role may be powerful enough to result in murders and suicides.

The sources of information for these types of stories are primarily journalistic, and we recognize the hazards of assuming these sources are accurate descriptions of what happened. Most research-oriented journals are understandably reluctant to publish material based on journalists' work, considering such reports to be subject to undetermined biases as well as possible inaccuracies (Hertzum, 2022). In one of the narratives, however, we base our description on direct statements of the mother of the murdered child, who has come forward as an activist working to prevent similar deaths. In another, the mother has also been willing to provide information to a colleague who supported her in court and has included her story in professional publications. In the third, the child's mother testified before a state legislature about the case. Three of the current authors (D.P., L.M., and S. A.-K.) had access to court documents, evaluators' reports, and other significant verifying information that is not available in every case. Our sources are thus mixed in nature, and this report does not claim to be the result of a systematic investigation. We hope that the report will stimulate an interest in systematic research into this tragic phenomenon. We should note that the narratives given here were presented, along with other relevant work, at the 2025 conference of the International Society for Prevention of Child Abuse and Neglect in Vilnius, Lithuania.

The Murder of Kayden Mancuso

Kayden Mancuso, for whom the VAWA model Kayden's Law is named, died at age 7 years in a murder-suicide carried out by her father (Ciavaglia, 2020; Sherlock, 2019). He appeared to have beaten Kayden with a barbell and suffocated her with a plastic bag over her head until she died. Then he hanged himself, having taken nitrous oxide so he would pass out and die from the noose he had arranged beforehand. The Pennsylvania child had expressed fear of her father after Mr. Mancuso assaulted his own mother in front of the little girl. Mr. Mancuso had a long history of violence and apparent mental illness, including biting off a man's ear in a brawl. Although the father had seemed satisfied with informal arrangements for contact with Kayden at one time, about two years before her death, he had begun to demand partial legal custody and frequently called the police when he felt he was not being given his custody rights. A court gave Mr. Mancuso unsupervised visitation with Kayden but recommended mental health treatment for him, presumably in response to the record of violent and abusive behavior. The court did not ask for evidence that treatment had taken place and had been successful before allowing Mr. Mancuso to have unsupervised overnight visits with Kayden. Kayden's mother later testified before the Pennsylvania state legislature that she had been accused by Mr. Mancuso of "parental alienation" (that is, of herself causing Kayden to fear and avoid her father), an allegation often followed by the claim that the accused parent is an abuser from whom the child must be protected by transferring custody to the other parent.

Although this case was thoroughly reported by journalists (e.g., Ciavaglia, 2020) and there are records from judicial and police proceedings, unanswered questions remain. Was there an event that triggered Mr. Mancuso's final actions toward Kayden and toward himself? Was his concern about his rights overwhelming when he knew mental health treatment had been recommended and may have felt this would compromise his agency? Did any characteristic or action of Kayden's precipitate his actions—for example, did she act frightened, cry, or say she wanted her mother? How long had he been planning acts that evidently required considerable preparation? With Mr. Mancuso's suicide, the chance of answering these questions becomes minimal, but this kind of information may be essential to understanding and preventing these filicides. Both situational and intentional factors may be relevant to predicting and preventing these events; of these two, the situational factors may be the only ones possible to determine.

The Murder of Om Moses Gandhi

Om Gandhi, for whom Utah's version of Kayden's Law is named, died at age 16 after being shot in the back and face by his father, a psychologist with a lengthy documented history of alleged abuse toward Om's mother and their children. At the time of Om's murder, his father was under investigation for drug diversion and felony sexual assault of a woman (Reavy, 2023). Following Om's murder, the father fatally shot himself. This case is well documented due to its prolonged course through the courts (the mother filed for divorce when Om was a preschooler, but the divorce was not finalized for five years) and the presence of accusations against Om's father from individuals outside the immediate family.

Om's mother recounted years of manipulation and abuse that the father directed at her and her two children, before and during the protracted custody litigation that followed her filing for divorce. She also filed a temporary protective order that was denied due to the ongoing custody dispute. Following that filing, she was prosecuted in criminal court after the father's complaint of custodial interference. That charge was dismissed because she had only once made a mistake regarding the visitation schedule. The father also accused her of "parental alienation" repeatedly throughout the 14-year custody dispute, sometimes using other words with similar meaning. The father, a licensed neuropsychologist, had previously been arrested for sex-related crimes, but had not reported this charge to his professional state licensing authority as required. Records related to

that arrest are reportedly unavailable and may have been expunged.

Om's mother recounts that the father characterized her reports as "delusional" and asserted that the children were unsafe in her care—allegations commonly associated with claims of parental alienation. Throughout his childhood, Om expressed fear of his father and tried to resist contact with him. Om frequently reported that his father abused him. Despite this, when Om was a young teen, the court-appointed custody evaluator and the guardian *ad litem* recommended splitting the children up, giving Om's full custody and decision-making to his father and the daughter's full custody to her mother. The mother was told that their recommendation was "the only viable option". The evaluator and guardian ad litem reportedly knew of his alleged sex crimes and did not give custody of a preteen girl to him but thought that giving him Om's custody might quell his anger and stop his threats and vexatious litigation. The mother told them that they were forcing her to sacrifice her son to save her daughter. Over time, Om is reported to have become increasingly demoralized. The transfer of custody appeared to have eliminated his remaining sense of agency and hope for escape. It dramatically reduced Om's contact with his mother. The final written custody evaluation report was sent to both parents, the lawyers, and the court, one year later. The report recommended full custody of both children to Om's mother. Despite her efforts to have the judge order that recommendation, the mother did not see Om again, as he was murdered three weeks later.

Om's mother, a certified nurse-midwife, testified about her case during hearings before the Utah State Legislature when lawmakers considered passage of Om's Law She also presented an account of Om's murder at four professional conferences in the United States and an international professional conference in Lithuania—the October 2024 Annual Meeting of the American Academy of Child and Adolescent Psychiatry in Seattle, Washington; the January 2025 Preconference of the Academy on Violence and Abuse in San Diego, California prior to the San Diego Conference on Child and Family Maltreatment; the June 2025 APSAC Colloquium in New Orleans, Louisiana; the October 2025 International Society for the Prevention of Child Abuse and Neglect Congress in Vilnius, Lithuania; and the November 2025 Global Health Summit of the Academy on Violence and Abuse in Salt Lake City, Utah. A recording of presentations from this last conference on the topics of parental alienation and court-associated filicide is available online (see videos 13 through 19, Academy on Violence & Abuse, 2026).

As in the Mancuso case, unanswered (and perhaps unanswerable) questions remain, despite extensive documentation. Did Mr. Gandhi's awareness of the evaluator's report overwhelm him and lead to his violent actions? Would Mr. Gandhi have killed his daughter as well as his son if both children had gone to him? Was there some special point for him in the filicide of a son, perhaps a belief in the greater value of a boy, and thus greater revenge on Om's mother? When was the gun purchased, and was there any purpose for it other than preparation for murder and suicide? Was this filicide one in which the ready availability of a gun would make possible an impulsive act, and stricter gun control might have prevented Om's death? What precipitated the fatal actions—did Om, a sixteen-year-old, confront and contradict his father, or did he act frightened or try to escape? Children's individual characteristics and behaviors may play a role in these filicides, but that possibility remains unexplored.

The Murder of Tintin

Although these first two cases described above were in the United States, family court-associated filicides are a global phenomenon. In Sweden, an 8-year-old boy, known as Tintin, had been the subject of a lengthy custody and relocation family court lawsuit. Tintin had expressed to support workers fear of spending time with his father. His mother supported his expression of his fears and begged the court to ensure that any court-ordered visitation was supervised. The mother described controlling and concerning behaviors by the father, which escalated

during the pregnancy with Tintin. Following the child's birth, he led the mother to fear that he would kidnap Tintin and take him abroad.

The father began raising "alienation" allegations in courts and had a Swedish "parental alienation" expert testify on his behalf. The father did not initially raise alienation issues but did so later when he felt that his applications for joint custody and shared residence were not supported by the court. In considering the father's applications, the court failed to appropriately consider the risks associated with the father's behavior and Tintin's fears. The court felt that limiting visitation time would be sufficient to reduce any potential risk to Tintin. Two hours was considered too little unsupervised time to pose any risk to his life, but two hours was enough for the father to strangle the little boy and leave his lifeless body in the bathtub. The father thereafter cut himself, which he claimed was an attempt to end his life. He survived and was criminally convicted and imprisoned. The father left a handwritten note behind him on the scene in which he referred to "conspiracies" and "the terrible [legal] processes" being to "blame" for his murder. He claimed to have killed Tintin in order to "save him".

Tintin's mum has carefully described the devastating experience and the connections between Tintin's 2023 filicide and her experiences of the legal processes in an autobiography called "Never Forget Tintin" (Gharaee & Rutbäck Eriksson, 2024). The brutal murder of Tintin led to a public outcry and national concerns surrounding the family court system and its need for legal reform. "Lex Tintin", the name for the popular movement for legislation to stop forced visitation with parents, became a driving force for change. In early 2025, the Swedish national law "A Safer Home for Children Act" was enacted. The law removed the presumption of parental involvement and contact in the context of domestic violence and abuse or other serious risks from the Family Act 1949:381, Section 6, para 2a (see Lex Tintin, 2023).

Tintin's father was convicted of murder and sentenced to life in prison, but the criminal court system did not strongly protect Tintin's left-behind family members. This became apparent in 2025 when the father was granted "temporary prison release" following two years of good behavior. Similarly, Tintin's mum did not initially succeed in having the non-molestation protective order renewed.-

Questions to Consider

These three cases were chosen from a much larger number of occurrences of family court-associated filicides. To what extent the chosen cases are typical is a question that must await much more systematic investigation, which we hope to see in the near future. However, these three cases by themselves raise several important questions.

Is There an Appropriate Comparison for Filicides Associated With Family Courts?

Research on child homicides has not previously focused specifically on court-associated filicides. A report of the Center for Judicial Excellence (2023) examined 944 cases of child murders associated with divorce, separation, or court involvement. Of these, about 100 were deemed to have been preventable, using criteria that included a protective parent trying to limit an abusive parent's access to a child and the existence of risk factors that a court should have recognized. Van Berkel et al. (2025) compared cases of fatal and non-fatal parental violence against children and concluded that the risk factors were similar. If this is correct, non-fatal violence may provide a broader comparison.

Is It Appropriate to Gender These Cases?

Fathers were the murderers in all the cases we describe here. We do not know of any case where a mother whose child was court-ordered to visit her, then murdered the child. This fact is relevant to arguments that mothers are favored in courts, that women's mental illnesses may be different from men's, or that, as men are more likely to behave violently than women, it is not surprising that they are more often involved in child deaths. Work like that of Ozcanli et al. (2024) has indicated that

paternal and maternal filicides follow different patterns. It appears that family court-associated filicide may be a highly gendered phenomenon.

A gendered approach appears to be needed to comprehend family court-associated filicides, although it is very likely to be met with complaints of gender bias from fathers' rights organizations. Without a gendered approach, we might well miss predictive situational and other factors of special importance to men. Although we have yet to analyze all the collected data about family court-associated filicides and are presenting a very small sample in this paper, observations of extreme gender differences cannot be ignored. This is especially true because gender differences in filicide are already well known. It is notable that some forms of filicide are almost always committed by mothers and it would be foolish to try to claim otherwise. For example, killings of infants are commonly committed by mothers experiencing perinatal mood disorders; this is true to such an extent that many states have, over decades, held training programs for professionals working with pregnant women and young mothers, directed toward identification of depression and prevention of a downward emotional spiral that might culminate in an infant's death. Mothers of infants and young children may also harm children in response to minor problems, as a result of their own fatigue and the constant responsibility that most often falls to women.

The gender of the murderers in family court-associated filicides should be regarded as a fact that can help us understand and prevent these deaths. This information is not a general statement about the nature of men as compared to that of women and should not be subject to either feminist or anti-feminist argument; instead, it should be considered as a step in scientific investigation.

Are We Saying That Courts Cause These Child Deaths?

Placing blame for children's deaths is not helpful, especially when definitive research may not be possible. That is why we have spoken of the filicides as being *associated* with court decisions rather than *caused* by them. These filicides, like other human events, have multiple causes that can sometimes be traced back to times before the birth of the child or even of the parents, and that include societal issues like beliefs about men's and women's roles.

In real-world phenomena, apparent causation can turn on the existence of confounding variables or of unidentified alternative factors. In our cases, for example, mental illness may have led to marital dissolution and family court involvement but may simultaneously be the direct cause of the filicide. Or a child's behavior may trigger a filicidal parent by reminding the parent of their own childhood experiences with violence. For example, a parent who, as a child, had been beaten for crying and beaten further when he or she cried during or after the beating, might feel driven, by anxiety associated with crying, to beat a crying child until the crying stops—which will happen only when the child is unconscious or dead.

We do argue, however, that changes in family court practices could prevent some of the child deaths described earlier. We note the use by the Center for Judicial Excellence (2023) of the term *preventable* homicides. For purposes of prevention, the court's first thought about a child's stated fear of a parent should be that the child may have an excellent reason for fear—not that another adult has in some way caused the child to feel frightened of the rejected parent, or that the child is lying.

When a court considers and respects a child's stated fear of a parent, the court has the option of ordering supervised visitation, which will make the child feel safer and can also provide useful information about the conduct of both parent and child. A parent who has the best interests of the child in mind may be embarrassed by supervision but should be willing to work as needed to make the child feel comfortable. Orders for immediate unsupervised visitation, especially overnight, are not calculated to make the child's expectations more positive. Instead, such orders emphasize a child's lack of agency and thus

add to the fear of the now unescapable unknown. For children who have difficulty with transitions, for reasons of temperament or neurodivergence, such dramatic changes may be especially frightening.

The court should take into account past history of violent or coercive behavior (AbiNader et al, 2023). Abuse of the mother is to some extent predictive of abuse of a child (Graham et al, 2025). Even abuse of animals is relevant to predicting a parent's behavior when a visit is unsupervised. Overnight visits, with their issues of sleeping arrangements and schedules, offer many opportunities for anger and violent behavior that may escalate to filicide. When anger management has been ordered, courts need to consider not only whether the parent attended the treatment, but whether an updated assessment shows that progress has been made; decisions should not be based solely on a parent's participation.

Are Family Court Associated-Filicides Connected with Parental Alienation Beliefs?

The concept of *parental alienation* is used to argue that a child who expresses fear of a parent may do so because the preferred parent has created that fear, not because there is a history of abuse or violence or other reasons for fearfulness. APSAC has posted a policy statement rejecting the parental alienation view, noting that parental alienation principles and practices are unsupported by systematic research (APSAC Position Statement, 2023). When courts adopt the parental alienation argument, they are disinclined to take the child's fears seriously, instead making the assumption that the child's feelings are unrealistic and have been shaped by the other parent in an effort to interfere with the feared parent's custody rights.

The parental alienation concept and related treatments are aspects of legal argument that are rarely proposed, except in family court. Parental alienation allegations can be used to support orders of unsupervised visitation, and at the most extreme, they may result in orders of custody transfer. Such orders can lead to short or long periods of no contact with a preferred parent and close contact with a parent whom the child fears and wants to avoid. The children in these cases may have no way to escape from attacks and no way to summon help, thus increasing the possibility of filicide. Allegations of parental alienation were present in the cases we described earlier and may have had an unfortunate influence on judicial decisions that placed the children in harm's way.

Are Orders for Reunification Therapies an Aspect of Family Court-Associated Filicides?

Reunification therapies may be court-ordered when the court is convinced that parental alienation is present. Reunification therapies, as the term is used in the parental alienation context, are psychosocial treatments whose goal is to create a positive relationship between a child and the parent that the child is thought to have rejected. There are no data on how often this occurs, or on the types of reunification therapy ordered. Most children ordered into reunification therapy probably attend office-based treatments that remain undescribed in published material. A smaller number are ordered into intensive treatments such as Family Bridges or Turning Point for Families. Intensive reunification therapies are programs in which children are removed (usually by court order) from the home of the preferred parent, taken to a sometimes-distant treatment venue, and kept in constant contact with the rejected parent for a period of about four days, during which time they are shown videos and receive lectures about having been brainwashed by the preferred parent.

In some of the office-based treatments and all of the intensive reunification therapies, a requirement is cessation of all contact with the preferred parent, usually for at least 90 days, and custody transfer to the avoided parent (see Mercer, 2025). The child is thus alone with the feared parent much or all of the time, a situation that may open the door to the murders we are calling family court-associated filicides. There is no evidence that reunification therapies are safe and effective (Mercer, 2022; Trane, Champion, & Hupp, 2022).

Is There an Agreed-On Definition of "Therapeutic Parenting"?

When children fear one parent and try to avoid contact with them, courts may assume that the child will suffer in the long run from the absence of contact, basing this conclusion on the unsupported belief that all children require relationships with both of their parents to develop normally. Courts operating on this principle may regard children as needing "reunification" with the avoided parent and may order ill-defined "therapeutic parenting time." An important topic for systematic investigation will be how many children are court-ordered to "therapeutic parenting".

There is currently no clear definition of therapeutic parenting or therapeutic parenting time, but such orders appear generally to require face-to-face contact between children and parents whom they want to avoid. The details of these orders vary, and no evidence has been published to support the idea that "therapeutic parenting" in any form is safe or effective. Orders for unsupervised "therapeutic parenting" set the stage for the possibility of family court-associated filicide when children are left alone with feared parents.

What About Children Who Are Not Murdered?

Most of the children who are ordered into contact with feared parents are not murdered, but this does not mean that their lives and development are unaffected by their experiences. Before, during, and after contact with a feared parent, a child will experience intense fear and anxiety as he or she anticipates the parent repeating the behavior that initially gave rise to the child's fears. Although it is difficult to assess the impact of fear *per se,* it is clear that many of the events studied as adverse childhood experiences (ACEs; Felitti et al., 1998) are accompanied by fear and anxiety. As is the case for many of the issues discussed here, we have no data to support the idea that long-term fear of a parent is harmful for a child, but most readers will probably accept this as given, especially in cases where the feared parent is demanding contact and working to isolate the child from the preferred parent. We would suggest that children who survive the possibility of family court-associated filicide are nevertheless harmed by their experiences even when no specific form of abuse is identified during their time alone with the feared parent.

Are There Risk Factors That Could Inform Decisions About Custody/Contact and Prevent Harm?

The connections between intimate partner violence (IPV) and child fatalities have been explored and confirmed (Graham et al, 2025). Danger assessments for the prediction of adult IPV exist, with one short screening instrument even usable by first responders (Messing et al., 2015). Such an instrument for the prediction of filicide has yet to be developed. Items from adult danger assessments provide few helpful parallels. Although our previous cautions about our data still strongly apply, we suggest that common factors in our three cases may provide the foundation for filicide probability assessment. As Table 1 shows, these cases shared a number of factors: there were histories of IPV and criminal conduct by the fathers; the children reported fear and resisted contact; the mothers warned of danger and requested supervision of father-child contact; there were allegations of parental alienation. Without further data, we may simply hypothesize that recognizing this pattern of factors may help to predict filicide and thus may enable courts to reduce the probability of such murders by exercising extreme care in ordering unsupervised father-child contact. It goes without saying that much further work needs to be done before any definitive statement about filicide assessment can be made.

Table 1

Factors in Three Filicides by Fathers

	Kayden's case	Om's case	Tintin's case
Child age	7	16	8
Child gender	F	M	M
Timeline	2 years	14 years	8 years
Previous IPV	Yes	Yes	Yes
Father criminal history	Yes	Yes	Unknown
Mother warned or asked for supervision	Yes	Yes	Yes
Child stated fear, resisted	Yes	Yes	Yes
Parental alienation alleged	Yes	Yes	Yes
Murder method	Beating, suffocation	Gunshot	Strangulation
Completed suicide	Yes	Yes	No

The Danger Assessment for IPV and its short screening version (Messing et al., 2015) consider possession of firearms as a predictive factor for IPV. In one of our three cases, awareness of a father's possession of a gun might have been a useful predictor. However, killing a young child does not require firearms and may easily be accomplished by beating with readily available objects or by asphyxiation. Manual strangulation is always possible for younger children, although it may be more difficult with a strong teenager. It may be that plans, intentions, or fantasies of killing a child are more significant predictors than possession of weapons, and the existence of those factors is not likely to be determinable before the act. Nevertheless, to the extent that a court can identify weapons as risk factors, caution about father-child contact may be justified, especially when other risk factors are present.

What Directions Should Research on Court-Associated Filicides Take?

Development of an instrument for predicting filicides is a pressing need. Such an instrument would provide essential guidance to courts and assist in the prevention of court-associated child murders. We have offered some possible predictive items in this paper and hope to have others join us in this work. A validated prediction instrument would require extensive investigation of large numbers of cases. Before this has been done, however, we suggest that courts consider the possible predictive items we have described and use them to decide whether supervision of contact is needed. This would be a simple step that could prevent family court-associated filicides. There can be downsides to decisions to order supervision in cases where it is not actually needed, such as expenses for the family and exacerbation of conflicts where supervised parents feel they are treated unfairly, but these weigh lightly in comparison to the risk of filicides and parental suicides.

A second direction for research is one that is rarely mentioned in the context of parental alienation allegations and mentioned only in simple terms in the context of filicides: characteristics of the murdered children. The children in these (and indeed in all) cases are more than pawns whose moves are caused by adults. Most descriptions of child characteristics, however, are limited to measures like age and gender. We know, however, that parent and child characteristics interact to create relationships and outcomes. Sameroff (2009) emphasized the transactional nature of parent-child

relationships, in which each member of the dyad shapes the behavior of the other over time, rather than a parent simply shaping the development of the child. For example, a parent's temperamental characteristics help determine cooperation or conflict about the child's characteristics, and the child's typical behaviors present demands that the parent responds to in ways shaped by the parent's own constitutional factors.

Cognitive and emotional characteristics of children may help to determine whether a filicide does or does not occur, even when many parental risk factors exist. The possible nature of this still purely hypothetical factor is well beyond the scope of this paper. However, we can point to child mental health issues such as oppositional defiant disorder or autism, temperamental factors such as anxiety or slowness to adapt, or even chronic medical conditions as factors that could lead directly to parental rejection or indirectly to filicide. Research on child characteristics in cases of family court-associated filicide may be essential to help courts make life-saving decisions about parent-child contact.



Conclusion

Public and professional awareness of family court-associated filicides is critical to prevention of child deaths and other harms. Although information about risk factors in these cases is limited, some commonalities can be suggested and information about these could be used to reduce the chances of family court-associated filicides. To use this information, it would be essential for courts to realize that mothers' warnings about the danger of father-child contact may be risk factors to take seriously rather than evidence of parental alienation. If family courts would limit acceptance of parental alienation arguments to cases where clear evidence of alienating behavior is present, they could avoid some of the orders that can lead to filicide. Even more importantly, if family courts would regularly attend to children's explanations of their concerns about contact with one parent, they could avoid some of the judicial pitfalls associated with assumptions about parental alienation and about the safety and effectiveness of reunification treatments. These assumptions appear to have driven some decisions that preceded filicide.

We propose research on assessment of filicide predictability and include in this topic investigation of the roles child characteristics play in the occurrence of filicides. Until such research has been done, we suggest that courts may do well to base custody and contact decisions in part on some of the risk factors discussed in this paper. We hope that *Advisor* readers will keep these concerns in mind when working in the child custody area and will join us in formulating and implementing the proposed investigations. ■

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References

AbiNader, M., Messing, J., Cimino, A., Bolyard, R., & Campbell, J. (2023). Predicting intimate partner violence, reassault, and homicide: A practitioner's guide to making sense of predictive validity statistics. *Social Work*, *68*(1), 81-85. https://doi.org/10.1093/sw/swac044

Academy on Violence & Abuse (2026). *AVA Global Health Summit 2025*. Retrieved April 13, 2026 from https://www.avahealth.org/what-we-do/global-health-summit/2025-global-health-summit-videos.html

Bernet, W. (2022). Introduction to parental alienation. In D. Lorandos & W. Bernet (Eds.), *Parental alienation—science and law* (pp. 5-43). Charles C. Thomas.

Center for Judicial Excellence. (2023*). Child Safety First: Preventing child homicides during divorce, separation, and child custody disputes. Recommendations for reforming U.S. family courts.* Center for Judicial Excellence. https://centerforjudicialexcellence.org/wp-content/uploads/2023/09/CJE-ChildSafety-Report.pdf

Ciavaglia, J. (2020, Dec. 17). *Kayden Mancuso's mother sues Bucks County judge, others she says failed to prevent daughter's death*. Bucks County *Courier Times*. https://www.phillyburbs.com/story/news/2020/12/17/kayden-mancuso-jeffrey-trauger-child-custody-family-court-murder-bucks-county-court-lower-makefield/3920668001/

Felitti, V., Anda, R., Nordenberg, D., David F Williamson, D.F., Spitz, A.M., Edwards, V., Koss, M.P., & Marks, J.S. (1998). Relationship of childhood abuse and household dysfunction to many of the leading causes of death in adults: The Adverse Childhood Experiences (ACE) Study. *American Journal of Preventive Medicine, 14,* 245-258. https://doi.org/10.1016/S0749-3797(98)00017-8

Freeman, B. (2022). The psychosocial assessment of contact refusal. In D. Lorandos & W. Bernet (Eds.), *Parental alienation—science and law* (pp. 44-81). Charles C. Thomas.

Gharaee, S., & Rutbäck Eriksson, S. (2024). *Glöm aldrig Tintin En Sann Berättelse [Never Forget Tintin: A True Story]*. Lind & Co.

Graham, L., Jun, H.-J,, Kim, T., Power, L., Devaney, J., Frederick, J., & Betz, G. (2025). Characteristics of child fatalities that occur in the context of current or past intimate partner violence: A scoping review. *Journal of Family Violence, 40(*6), 1211-1228. https://doi.org/10.1007/s10896-024-00713-z

Hertzum, M. (2022). How do journalists seek information from sources? A systematic review. *Information Processing & Management, 59*(6). Article 103087. https://doi.org/10.1016/j.ipm.2022.103087

Higgins, S. (2024, Feb. 7). *In the wake of tragedy, Om's Law aims to reform Utah's family court system*. KUER. https://www.kuer.org/politics-government/2024-02-07/in-the-wake-of-tragedy-oms-law-aims-to-reform-utahs-family-court-system

Kauppi, A., Vanamo, T., Karkola, K., & Merikanto, J. (2012). Fatal child abuse: A study of 13 cases of continuous abuse. *Mental Illness, 4*(1), e2. https://doi.org/10.4081/mi.2012.e2

Lex Tintin (2023). *Lex Tintin.* https://lextintin.se/

Mercer, J. (2022). Reunification therapies for parental alienation: Tenets, empirical evidence, commonalities, and differences. *Journal of Family Trauma, Child Custody, and Child Development., 19*, 383-401. https://doi.org/10.1080/26904586.2022.2080147

Mercer, J. (2025*) Someone said parental alienation*. Routledge.

Messing, J., Campbell, J., & Patchell, B. (2015). The Lethality Screen: The predictive validity of an intimate partner violence risk assessment for use by first responders. *Journal of Interpersonal Violence*, *32*(2), 205-226. https://doi.org/10.1177/0886260515585540

Moen, M., & Bezuidenhout, C. (2023). Killing your children to hurt your partner: A South African perspective on the motivations for revenge filicide. *Journal of Investigative Psychology & Offender Profiling, 20(*1), 33-47. https://doi.org/10.1002/jip.1603

Myers, W., Lee, E., Montplaisir, R., Lazarou, E., Safarik, M., Chan, H., & Beauregard, E. (2021). Revenge filicide: An international perspective through 62 cases. *Behavioral Sciences & the Law, 39* (2), 205-215. https://doi.org/10.1002/bsl.2505

Ozcanli, T. Okur, I., Poyraz, C., Kocabasoglu, N., & Asliyuksek, H. (2024). Patterns in paternal and maternal filicide: A comparative analysis of filicide cases in Turkey. *Journal of Forensic Sciences, 69*, 2110-2119. https://doi.org/10.1111/1556-4029.15625

Robideaux, S. (2022, Oct. 28). *Kayden's law and the future of family courts*. Legal Research Club. University of Alabama. https://legalresearchclub.ua.edu/2022/10/28/kaydens-law-and-the-future-of-family-court/

Sameroff, A. (2009*). The transactional model of development: How children and contexts shape each other.* American Psychological Association. https://doi.org/10.1037/11877-000

Spearman, K., Ayeb-Karlsson, S., Guillaume, D., Alexander, K.A. & Campbell, J. (2025). A Theoretical model of reproductive coercion and abuse and legal entrapment: Barriers to health, safety, and well-being for mothers and children. *Journal of Family Violence*. https://doi.org/10.1007/s10896-025-01034-5

Sherlock, K. (2019). *Testimony of Kathryn Sherlock, mother of Kayden Mancuso, OPPOSING HB1397*. Pennsylvania Legislature. https://www.palegis.us/house/committees/committee-archives/archive-file?file=2019_0158_0009_tstmny.pdf

Trane S., Champion, K. & Hupp, S. (2022). Comparison of parental alienation treatments and evidence-based treatments for children in families. In J. Mercer & M. Drew (Eds.), *Challenging parental alienation* (pp. 138-158). Routledge.

Van Berkel, S., Aarten, P., Alink, L., & Liem,M. (2025). Estimating risk on filicide: A comparison of risk factors between fatal and non-fatal parental violence against children. *Aggression & Violent Behavior, 85*, 1-10. https://doi.org/10.1016/j.avb.2025.102106

Vileisis, J., & Laufer, B. (2025). Domestic violence as a precursor of maternal filicide. *Archives of Women's Mental Health, 28*(3). 449-454. https://doi.org/10.1007/s00737-024-01430-8

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